

CONFLICTS OF INTEREST POLICY

Policy:

1. The members of the board of directors and the executive management (the “**Board**”) of Tradehold Limited (“**Tradehold**” or the “**Company**”) and its subsidiaries (collectively the “**Group**”), are obliged to promptly disclose in writing to the Board any interests they have within or outside the Company or Group that may interfere or conflict with the performance of their duties.
2. All Company or Group related information that becomes known to directors in their performance of their duties must at all times be kept confidential.
3. At least once annually, each Board member and member of executive management will be requested to disclose information concerning actual or potential conflicts of interest in writing to the Board, which shall be recorded and maintained in a register.
4. If it is determined by the Board as a whole that a conflict of interest exists, the matter will be resolved in a manner that is satisfactory to the Board, including without limitation by:
 - (i) requiring that the Board member cease the conflicting outside activity or involvement;
 - (ii) requiring that the Board member be recused from performing the duty which causes the conflict to exist;
 - (iii) permitting the conflict to continue if the Board as a whole decides that it does not significantly affect the best interest of the Company; and/or
 - (iv) appropriate disciplinary actionas appropriate.
5. This policy (“**the Policy**”) shall apply equally to any appointed executive, non-executive and/or alternate director of the Board of the Company or the Group.

Reporting:

The Board will ensure that in order to comply with the JSE Debt Listings Requirements, the Company will report to shareholders in its annual report on any current conflicts of interest and/or personal financial interests of individual members of the Board and executive management of the Group, which shall be made available on the website of the Company. The conflicts of interest are disclosed on page 10 and the personal financial interests on page 137 of the Integrated Report 2021

Approval:

This policy was updated and approved by the Board on 20 May 2021.

C H WIESE

CHAIRMAN