



**Peregrine Global US Protected Equity Fund**  
**Schedule of Similarities and Differences between**  
**a) Guernsey & South African Regulations;**  
**b) Guernsey & South African Collective Investment Scheme**

No.	Topic/Item	Foreign Regulation/Foreign Scheme	South African Regulation/South African Unit Trust
1.	Investment restriction of instruments issued by Government	<b>Regulation:</b> No limit <b>Scheme:</b> 90% of interest-bearing instruments included in the Fund, as measured by their market value, must have a credit rating of "investment grade" by Standard & Poor's, Moody's and/or Fitch.	No limit.
2.	Investment restriction on an individual security i.r.o. equity portfolios	<b>Regulation:</b> No limit <b>Scheme:</b> A maximum of 10% of the Net Asset Value of the Fund may be invested in transferable securities issued by the same issuer.	Maximum of 5% of portfolio if company market cap is less than R2 billion, else 10%.
3.	Investment restriction on a class of security i.r.o. equity portfolios	<b>Regulation:</b> No limit <b>Scheme:</b> No limit	Maximum of 5% of amount in issue if company market cap. is less than R2 billion, else 10%. An overall limit of 15% of the aggregate amount of securities in any one class issued by a concern within the same group as the manager across all portfolios. An overall limit of 24% of the aggregate amount of securities in any one class issued by a concern other than a concern within the same group as the manager across all portfolios.
4.	Investment restrictions for specialist funds eg. money market portfolio or fund of funds or feeder funds	<b>Regulation:</b> No limit <b>Scheme:</b> Fund may only invest in Authorised Schemes.  "Authorised Schemes" comprise those collective investment schemes, listed or unlisted, which must meet all the criteria below: - The scheme is operated on a similar criteria to those applicable to South African domiciled collective investment schemes in securities and such a scheme may not be classified as a hedge fund. - The scheme is not allowed to utilize borrowing for the purpose of gearing; - The scheme may only use derivatives for efficient portfolio management and no uncovered positions are allowed; - The scheme offers a minimum of weekly investor dealing; - The scheme does not invest in instruments that compel the acceptance of physical delivery of a commodity - The scheme has a risk profile that is not significantly higher than the risk profile of Other schemes that may be included in the fund. - The scheme is not a synthetic exchange traded fund ("EFT") nor is it a leveraged.	Subject to certain limits prescribed in regulation ( <i>Applicant must Furnish detail regarding the specific type of portfolio is applicable</i> ).
5. **	Investment restrictions on the use of derivative instruments	<b>Regulation:</b> No limits <b>Scheme:</b> Derivatives shall be used to protect the downside risk of the portfolio and for efficient portfolio management (i.e. no gearing or leveraging will be allowed). Unlisted derivative instruments will only be allowed for unlisted forward currency, interest rate or exchange rate swap transactions associated with transactions to hedge non-US\$ exposure related to specific underlying securities in the Fund. No uncovered short derivative positions will be allowed. Typical transactions would include the purchase of protective puts or put spreads. This can be combined with covered call writing in order to reduce the cost of purchased protection. Index futures would be used to equitise beta, manage cash flows and to manage the varying levels of delta against the option positions.	100% nominal exposure restricted for purposes of efficient portfolio management only/no gearing allowed.
6. **	Investment in listed instruments	<b>Regulation:</b> No limit <b>Scheme:</b> - Investment in equity securities issued by companies not listed on a Principal Exchange (= World Federation of Exchanges + LSE + NYSE + CME) will be limited to a maximum of 10% of the Net Asset Value of the Fund. - Investment in non-US listed equity securities will be limited to 30% of the Net Asset Value of the Fund. - The Fund may invest in listed (and unlisted) collective investment schemes subject to the restrictions in 4. Above.	90% of securities must be listed on Exchanges having obtained full membership of the World Federation of Exchanges (not applicable to New York Stock Exchange and London Stock Exchange).
7. **	Non-equity securities (other than issued by the Government)	<b>Regulation:</b> No limit <b>Scheme:</b> 90% of the interest-bearing instruments held by the Fund (if any), as measured by their market value, must have a credit rating of "investment grade" by Standard & Poors, Moody's and/or Fitch.	Must be rated and limits as prescribed in Regulation.
8. **	Investment in unlisted instruments	<b>Regulation:</b> No limit <b>Scheme:</b> the Fund may invest in unlisted (and listed) collective investment schemes (see 4 above).	Instrument must be listed within 12 months of purchase date or disposed of, max 10% of portfolio value.
9.	Investment of own resources into the fund	<b>Regulation:</b> No requirement <b>Scheme:</b> Manager does not intend to invest own resources into fund.	Manager must invest 10% of own resources in each fund; can be limited to R1,000,000 maximum per fund? The R1m may be reduced with 10% for every R1m invested.
10. **	Borrowing  Leveraging/Gearing (refer to 1)	<b>Regulation:</b> No limit <b>Scheme:</b> The Fund may borrow up to 10% of its Net Asset Value. Borrowing may not be utilised for the purposes of gearing and will only be incurred for the purposes of settlement or for the purposes of payments upon redemption of Participating Shares when in the opinion of the Manager it is in the interest of the Fund to borrow rather than liquidate investments.	10 % of the Value of the underlying portfolio permitted for redemption of participatory interests only.  <u>Leverage/Gearing not allowed.</u>
11.1	Markets/Exchanges Listed	<b>Regulation:</b> No limit <b>Scheme:</b> Investment in equity securities issued by companies not listed on a Principal Exchange will be limited to a maximum of 10% of the Net Asset Value of the Fund.	90% of exchanges must have been granted full membership of the World Federation of Exchanges (not applicable to New York Stock Exchange and London Stock Exchange), the rest must follow due diligence guidelines as prescribed by Regulation.
11.2	OTC Markets**	<b>Regulation:</b> No limit <b>Scheme:</b> Unlisted derivative instruments will only be allowed for unlisted forward currency, interest rate or exchange rate swap transactions associated with transactions to hedge non-US\$ exposure related to specific underlying securities in the Fund.	Not allowed.
12. **	Expenses/Charges	<b>Regulation:</b> None	Full disclosure in Deed and a notice to unit holders of change.
12.1	Costs to investors	Full disclosure in scheme particulars and a notice to shareholders of change.	Brokerage, MST, VAT, stamp duties, taxes, audit fee, bank charges, trustee/custodian fees, other levies or taxes service charge and share creation fees payable to the Registrar of Companies.
12.2	Charges against income of the portfolio.	Brokerage, stamp duties, taxes, audit fee, bank charges, management fees, administration fees, custodian fees, all fees payable to the GFSC, Guernsey Registry and the States of Guernsey Income Tax Department, any stock exchange and of any regulatory authority in a country or territory outside Guernsey in which Participating Shares are or may be marketed and all other charges or fees expressly authorised by the Supplemental Particulars, the Articles or by law.	
13.	Determination of market value of investments	- Collective investment schemes: latest available price. - Listed securities: latest trade price as at the relevant Valuation Point - Deposits: principal amount plus accrued interest calculated on a daily basis; - Forward foreign exchange contracts: valued by reference to market value of similar contracts settled as at the relevant Valuation Point. - Financial futures contracts and purchased or sold options: assessed by reference to the prevailing prices on the relevant futures/options exchanges.	Fair market price, or as determined by stockbroker.
14.	Risk factors	Disclosed in scheme particulars	Disclosed in application form at initial investment.
15. **	Capped or not capped	Not capped	Not capped.
16. **	Redemption (repurchase) of participatory interests	Legally obliged to redeem at same day's or previous day's price as determined in the scheme particulars.	Legally obliged to redeem at same day's or previous day's price as determined in Deed.
17.	Independent Trustee/custodian	<b>Regulation:</b> Custodian and administrator must be different companies, but may be fellow subsidiaries of the same group. <b>Scheme:</b> Custodian and Administrator are independent companies with independent boards, but part of the same group of companies.	Trustee/custodian must be completely independent.
18. **	Taxation of Portfolio	No taxation	No taxation. Interest portion taxable in the hands of the individual.
19. **	Taxation of unitholders	No taxation in Guernsey. Taxation will take place in accordance with laws of the investor's country of residence.	
19.1	Income -Dividends / Interest		Only interest portion is taxable.

19.2	-Capital gains		Capital gains tax introduced on 1 October 2001.
20. **	Interval at which participatory interests are priced	Daily	Daily.
21. **	Distributions	Dividends will automatically be applied towards the acquisition of additional Participating Shares on the Dealing Day following the relevant Payment Date at the Fund's relevant Net Asset Value per Share unless a shareholder request in writing otherwise.	All income distributed regularly or reinvested at option of the investor.
22. **	Switching	Shareholders are entitled to exchange Participating Shares between classes at no charge.	Allowed – charges differ.
23. **	Pledging of securities (See 10)	Allowed only for purposes of borrowing (refer to borrowing in par 10 above)	Allowed only for purposes of borrowing (refer to borrowing in par 10 above).
24. **	Scriplending	Not allowed	Allowed, may not exceed 50% of market value the portfolio, plus other conditions as prescribed in Deed.
	Scripborrowing	Not allowed	Not allowed.
25. **	Certificates, if issued and needed for redemption	All Participating Shares are issued in registered form and the register will be conclusive evidence of ownership.	Issued on request.
26.	Reporting to supervisory authority	Quarterly and annually	Quarterly and annually.
27.	Inspection powers by supervisory authority	Yes	Yes.
28. **	Reporting to investors	Monthly	Annually.
29. **	Legal structure if different from trust	Separate cell of a protected open-ended cell company	Collective Investment Scheme, whether trust based or Open Ended Investment Company.
30.	Interest earned on funds pending investment and redemption	No interest earned on funds pending investment and redemption	Interest paid to clients.
31. **	Any other material difference	None	

\*\* Please refer to the Peregrine Global US Protected Equity Fund Core Scheme Particulars & Supplemental Scheme Particulars. Alternatively, for further information please contact [info@peregrine.gg](mailto:info@peregrine.gg).