

ZIMBABWE STOCK EXCHANGE LIMITED ("ZSE")

PRACTICE NOTE 17

Issued pursuant to section 3 (1)(h) of Statutory Instrument 134 of 2019 ("the ZSE Listings Requirements").

MANDATORY SUBMISSION VIA COMPLIANCE DIRECT

1. Definitions

Terms used in this Practice Note which are defined or interpreted in the ZSE Listings Requirements shall have the same meaning as in the ZSE Listings Requirements.

2. Purpose

The purpose of this Practice Note is to mandate the use of the Compliance Direct Platform for all official correspondence, filings, and documentation submitted to ZSE by Issuers and Brokers. This mandate encompasses all aspects dealing with legal, compliance, and issuer regulation as governed by the ZSE Listings Requirements.

This change is being implemented to standardize our record-keeping, enhance data security, and accelerate processing times.

3. Mandatory submission requirements

3.1 Scope

Effective on the date noted below, all issuers and brokers must submit all formal correspondence and documentation via Compliance Direct.

3.2 Documentation Included

This requirement applies to, but is not limited to, the following:

- a) Formal inquiries and requests.
- b) Regulatory filings, reports, and disclosures.
- c) Legal and administrative submissions.

3.3 Exclusions

The following forms of communication may continue to be used for general or informal purposes, but do not constitute official submission:

- a) Routine email communication for instance scheduling a meeting or follow-up question.
- b) Telephone calls.

4. Submission Compliance and Consequences

4.1 Failure to comply

Any correspondence, filing, or document required to be submitted via Compliance Direct that is sent through an alternative channel (for example, personal or departmental email, physical mail, etc.) will be deemed not officially received.

4.2 Delayed Processing

ZSE will not be responsible for delays in processing or failures to act on any submission that bypasses the mandatory Compliance Direct process. The official receipt date for any document will be the date and time it is successfully uploaded to the Compliance Direct Portal.

If the Compliance Direct Platform experiences technical failure, ZSE will promptly communicate the contingency plan for the processing and acceptance of all required submissions.

5. Effective Date

The use of the Compliance Direct Platform will be optional during the transition period from 24 October 2025 to 31 December 2025. Accordingly, the mandatory provisions of this Practice Note shall take full force and effect beginning 01 January 2026.

For questions regarding access or functionality of the Compliance Direct Portal, please contact legal@zse.co.zw.

For and on behalf of the ZSE Limited



Justin Bgoni
Group CEO

Date of Issue: 24 October 2025