



**PRIME**  
INVESTMENTS

# Conflict of Interest Management Policy

Version 1.17

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## POLICY OWNERSHIP & REVISION HISTORY

### POLICY OWNER

The Complaints Resolution Policy is established by the Board of Prime Financial Services (Pty) Ltd, the holding company of the Prime Financial Services Group (the “Group”), for the implementation and benefit of the same. The policy is owned and maintained by the GRC Department.

### POLICY APPLICATION & ADOPTIONS

The current version of the Complaints Resolution Policy is specifically applicable to and approved by the following entities within the Prime Financial Services Group, as detailed below:

GROUP ENTITY	APPROVAL DATE	RESOLUTION NO.
Prime Financial Services (Pty) Ltd	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Capital Markets (Pty) Ltd	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd	30 April 2026	Res. 4 of the 2027 Financial Year
Prime Fund Services (Pty) Ltd	30 April 2026	Res. 10 of the 2027 Financial Year
Prime Independent Nominees (RF) (Pty) Ltd	30 April 2026	Res. 7 of the 2026 Financial Year
Prime Independent Trustees (Pty) Ltd	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Payroll Services (Pty) Ltd	30 April 2026	Res. 7 of the 2026 Financial Year
Prime Product Services (Pty) Ltd	30 April 2026	Res. 17 of the 2026 Financial Year
Global Administration Services (Pty) Ltd (Dormant)	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Investments Life (Pty) Ltd (Dormant)	30 April 2026	Res. 1 of the 2027 Financial Year
Prime Real Estate (Pty) Ltd (Dormant)	30 April 2026	Res. 1 of the 2027 Financial Year

### POLICY REVISIONS

Detailed below is a list of policy versions and the changes/amendments/additions made to the policy with each new version:

DATE	VERSION	CHANGES
Aug 2014	1.0	“Internal Complaints Resolution” policy established.
Aug 2014	1.1	<ul style="list-style-type: none"> <li>- Inclusion of Global Nominees in Group structure</li> <li>- Inclusion of Prime CIS in Group structure</li> <li>- “Introduction” has been amended</li> <li>- Point 2.1 amended to include reference to FSP categories</li> <li>- “List of Associates” compiled</li> <li>- “3<sup>rd</sup> Parties with Ownership Interest in Provider” compiled</li> </ul>
Aug 2015	1.2	<ul style="list-style-type: none"> <li>- Inclusion of Prime Alternative Investments (Pty) Ltd in Group structure</li> <li>- Inclusion of Retirement Funds in Group structure</li> </ul>
Aug 2015	1.3	<ul style="list-style-type: none"> <li>- Inclusion of PAI Holdings and Prime Asset Management (Pty) Ltd in Group structure.</li> <li>- GAA’s name is changed to Ascent Capital (Pty) Ltd.</li> </ul>
Nov 2015	1.4	<ul style="list-style-type: none"> <li>- Removal of the Unclaimed Retirement Funds from the Group structure.</li> <li>- “List of Associates” updated to reflect new Group structure</li> <li>- Inclusion of Annexure A: Revision History</li> </ul>
Jan 2016	1.5	<ul style="list-style-type: none"> <li>- Third Parties with Ownership Interest in Provider table updated to include SE Peters Family Trust, Prime Financial Services and C.V Sampson.</li> </ul>

Feb 2016	1.6	<ul style="list-style-type: none"> <li>- “List of Associates” updated.</li> <li>- “Third Parties with Ownership Interest in Provider” updated.</li> </ul>
Aug 2016	1.7	<ul style="list-style-type: none"> <li>- Global Employee Benefits (Pty) Ltd included in Group structure.</li> <li>- Inclusion of “Associates” in Group Structure. Policy reworded to make reference to both the Group and Associates where applicable.</li> <li>- Group structure amended to refer to “Prime Collective Investment Schemes Management Company (RF) (Pty) Ltd” and “Prime Alternative Investments (RF) (Pty) Ltd”.</li> <li>- Header formatting.</li> <li>- Point 5.2 amended to include the following: “. Should the direct superior be related in any way to the suspected Conflict of Interest, the employee is to make the report to management instead”</li> <li>- Point 5.7 “Monitoring” amended – typo removed.</li> <li>- Point 5.7 “Declining to Act” removed.</li> <li>- “List of Associates” amended to “Group Entity Relationships” and updated.</li> <li>- “Third Parties with Ownership Interest in Provider” updated.</li> </ul>
Feb 2017	1.8	<ul style="list-style-type: none"> <li>- Due to shareholding changes, Ascent Capital (Pty) Ltd. is now categorised as an Associate Company.</li> <li>- “Group Entity Relationships” amended to refer to Ascent Capital (Pty) Ltd. as an Associate Company.</li> </ul>
Aug 2017	1.9	<ul style="list-style-type: none"> <li>- Global Financial Administrators (Pty) Ltd included in Group structure.</li> <li>- Global Investment Administrators (Pty) Ltd. included in Group structure.</li> <li>- Global Payroll Services (Pty) Ltd included in Group structure.</li> <li>- Numbering &amp; format changes throughout document.</li> <li>- Section 7 updated in line with revised Group Structure.</li> <li>- Section 9 updated in line with revised Group Structure.</li> </ul>
Nov 2017	1.10	<ul style="list-style-type: none"> <li>- Format changes</li> <li>- Prime Real Estate (Pty) Ltd. included in Group structure.</li> <li>- Prime Trade Finance (RF) (Pty) Ltd included in Group structure.</li> <li>- Unclaimed Funds included in Group structure.</li> <li>- Orca Global Advisory (Pty) Ltd. included as an Associate.</li> <li>- Section 2: Definitions included</li> <li>- Section 8: Group Entity Relationships amended.</li> <li>- Section 10: Third Parties with Ownership in the Group amended.</li> <li>- Annexure A amended to Annexure 1.</li> </ul>
Jan 2018	1.11	<ul style="list-style-type: none"> <li>- Ascent Capital (Pty) Ltd reclassified as a Group company.</li> </ul>
Apr 2018	1.12	<ul style="list-style-type: none"> <li>- Group name amended to “Prime Financial Services Group”</li> <li>- Prime Trade Finance (RF) (Pty) Ltd removed from Group structure.</li> <li>- Mashamba Asset Managers (Pty) Ltd removed as an Associate company.</li> <li>- Orca Global Advisory (Pty) Ltd removed as an Associate company.</li> <li>- Section 2: Definitions updated</li> <li>- Section 8: Group Entity Relationships amended.</li> <li>- Section 10: Third Parties with Ownership in the Group amended.</li> <li>- Dormant companies removed from Group structure.</li> </ul>
May 2019	1.13	<ul style="list-style-type: none"> <li>- Group Entity Relationships updated.</li> <li>- Third Parties with Ownership Interest in the Group updated.</li> </ul>
Jun 2019	1.14	<ul style="list-style-type: none"> <li>- Address updated.</li> <li>- Format changes.</li> <li>- Global Financial Administrators (Pty) Ltd. Removed from Group structure.</li> <li>- Umbrella Funds removed from Group structure.</li> </ul>
Dec 2019	1.15	<ul style="list-style-type: none"> <li>- New heading “Application of the Policy” updated.</li> <li>- List of applicable companies updated.</li> </ul>

		<ul style="list-style-type: none"> <li>- Section 9: Group Entity Relationships updated.</li> <li>- Section 10: Group Ownership Interests in Third Parties updated.</li> <li>- Section 11: Third Party Ownerships with Interests in the Group updated.</li> </ul>
May 2023	1.16	<ul style="list-style-type: none"> <li>- Formatting amendments.</li> <li>- New definitions included for “Associates”, “Financial Interest”, “Immaterial Financial Interest”, “Ownership Interest”, and “Third Party”.</li> <li>- Section 5: Inclusion of clauses 5.4 – 5.6.</li> <li>- Section 6: Gifts included from the Code of Ethics policy alongside Annexures 1 &amp; 2 as well as the inclusion of amendments to clauses 6.2 – 6.4.</li> <li>- Section 8: Amendments made to the “Disclosure” clause 8.8.4.</li> </ul>
Feb 2025	1.17	<ul style="list-style-type: none"> <li>- Formatting amendments</li> <li>- Section 2: inclusion of clauses 2.1, 2.2 and 2.3.1 – 2.3.6</li> <li>- Section 3: new definition included for “Distribution Channel” and removal of definition for Prime CIS</li> <li>- Removed “Group Objectives” (previously section 4)</li> <li>- Section 4: Inclusion of clauses 4.1.5 – 4.1.7</li> <li>- Section 9: Grouped ownership interests and associates disclosure.</li> </ul>

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## 1. PURPOSE OF THE POLICY

- 1.1. The financial service providers within the Group are committed to resolving complaints in fair, transparent and effective manner. This commitment extends to not only equipping our staff with the necessary training and skills but also providing our clients with information and processes to log, escalate and resolve any complaints.
- 1.2. In terms of the General Code of Conduct a provider and a representative must avoid, and where this is not possible, mitigate any conflict of interest between the provider and a client, or a representative of the provider and his, her or its clients.
- 1.3. The Group is committed towards acting within the best interests of its clients and to avoid all conflict of interests in relation to the provision of financial services. Where the Group is unable to avoid a conflict of interest, all necessary precautions will be taken to ensure that any actual or potential conflict of interest is mitigated and adequately disclosed to clients.
- 1.4. The purpose of this document is to document the Group's commitment to establishing and maintaining a Conflict of Interest Management Policy, and therefore to:
  - 1.4.1. Establish internal controls and mechanisms to identify conflicts of interest.
  - 1.4.2. Establish measures to avoid conflicts of interest, and where avoidance is not possible, to provide reasons therefore.
  - 1.4.3. Establish measures to ensure that any unavoidable conflicts of interest are mitigated.
  - 1.4.4. Establish measures to ensure the proper disclosure of any conflicts of interest.
  - 1.4.5. Establish processes, procedures and internal controls to facilitate compliance with the policy.
  - 1.4.6. Communicate the consequences of non-compliance with the policy.

## 2. DEFINITIONS

- 2.1. **Associate:** The market conduct regulator of financial institutions, that provide financial products and financial services.in relation to a natural person:
  - 2.1.1. A person who is recognised in law or the tenets of religion as the spouse, life partner, or civil union partner of that person.
  - 2.1.2. A child of that person, including a stepchild, adopted child and a child born out of wedlock.
  - 2.1.3. A parent or stepparent of that person.
  - 2.1.4. A person in respect of which that person is recognised in law or appointed by a Court as the person legally responsible for managing the affairs of or meeting the daily care needs of the first mentioned person.
  - 2.1.5. A person who is a spouse, life partner or civil union partner of a person referred to above.
  - 2.1.6. A person who is in a commercial partnership with that person.
  - 2.1.7. In relation to a juristic person:

- i. Which is a company, means any subsidiary or holding company of that company, any other subsidiary of that holding company and any other company of which that holding company is a subsidiary.
- ii. Which is a close corporation registered under the Close Corporations Act, means any member thereof as defined in section 1 of that Act.
- iii. Which is not a company or a closed corporation, means another juristic person which would have been a subsidiary or holding company of the first-mentioned juristic person:
  - a. Had such first-mentioned juristic person been a company, or
  - b. In the case where that other person, too, is not a company, had both the first-mentioned juristic person and that other person been a company.
- iv. Means any person in accordance with whose directions or instructions the board of director of or, in the case where such juristic person is not a company, the governing body of such juristic person is accustomed to act.

2.1.8. In relation to any person:

- i. Means any juristic person of which the board of directors or, in the case where such juristic person is not a company, of which the governing body is accustomed to act in accordance with the directions or instructions of the person first-mentioned in this paragraph.
- ii. Includes any trust controlled or administered by that person.

2.2. **CIS Manager:** A manager registered with the Financial Sector Conduct Authority in terms of the Collective Investment Schemes Control Act (45 of 2002).

2.3. **Conflicts of Interest:** Conflicts of Interest are defined as any situation in which a Financial Service Provider or a Representative has an actual or potential interest that may, in rendering a financial service to a client:

2.3.1. Influence the objective performance of their obligations to that client; or

2.3.2. Prevent a provider or Representative from rendering an unbiased or fair financial service to that client, or from acting in the interest of that client, including but not limited to Financial Interests, ownership interests, or any relationship with a third party.

2.4. **Distribution Channel:** Any arrangement between a product supplier of any of its associates and one or more providers or any of its associates in terms of which arrangement any support or service is provided to the provider or providers in rendering a financial service to a client; any arrangement between two or more providers or any of their associates, which arrangement facilitates, supports or enhances a relationship between the provider or providers and a product supplier; and any arrangement between two or more product suppliers or any of their associates, which arrangement facilitates, supports or enhances a relationship between a provider or providers and a product supplier.

2.5. **Financial Interest:** Any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration, other than:

2.5.1. An Ownership Interest.

- 2.5.2. Training, that is not exclusively available to a selected group of providers or representatives, on: products and legal matters relating to those products; general financial and industry information; specialised technological systems of a third party necessary for the rendering of a financial service, but excluding travel and accommodation associated with that training.
- 2.5.3. A recognised qualifying enterprise development contribution to a qualifying beneficiary by a provider that is a measured entity.
- 2.6. **Financial Services Provider:** Any person (including both natural and juristic persons) other than a Representative who furnishes advice or who furnishes advice and renders intermediary services. For the purposes of abbreviation, it can also be referred to as a “FSP”.
- 2.7. **General Code of Conduct:** The General Code of Conduct for Authorised Financial Services Providers and Representatives as published in Board Notice 80 of 2003.
- 2.8. **Key Individual:** A person responsible for overseeing and managing the activities related to the rendering of any financial services on the part of appointed representatives.
- 2.9. **Ownership Interest:** Any equity or proprietary interest, for which fair value was paid by the owner at the time of acquisition, other than equity or a proprietary interest held as an approved nominee on behalf of another person, and includes any dividend, profit share or similar benefit derived from that equity or ownership interest.
- 2.10. **Immaterial Financial Interest:** Any Financial Interest with a determinable monetary value, the aggregate of which does not exceed R1 000 in any calendar year from the same third party in that calendar year received by:
  - 2.10.1. A provider who is a sole proprietor;
  - 2.10.2. A representative for that representative’s direct benefit; or
  - 2.10.3. A provider, who for its benefit or that of some or all of its representatives, aggregates the immaterial Financial Interest paid to its representatives.
- 2.11. **Representative:** Any person, as defined by the Financial Advisory and Intermediary Services Act, who renders a financial service to a client on behalf of a licenced Financial Services Provider by means of an employment contract or mandate.
- 2.12. **Third Party:** A product supplier; another provider; an Associate of a product supplier or a provider; a distribution channel; any person who in terms of an agreement or arrangement with a person referred to above provides a Financial Interest to a provider or its representatives.

### 3. IDENTIFYING A CONFLICT OF INTEREST

- 3.1. In determining whether there is or may be a Conflict of Interest to which the policy applies, the Group will consider whether there is a material risk of damage to the client, taking into account whether the Group, or an authorised Representative or employee: -
  - 3.1.1. is likely to make financial gain, or avoid a financial loss, at the expense of the client.
  - 3.1.2. has an interest in the outcome of a service provided to the client, which is distinct from the client’s interest in that outcome.

- 3.1.3. has a financial or other incentive to favour the interest of another client, group of clients or any other third party over the interests of the client.
  - 3.1.4. receives, or will receive, from a person other than the client, an inducement in relation to a service provided to the client in the form of monies, goods, or service, other than the legislated commission or reasonable fee for that service.
  - 3.1.5. receives a financial interest or immaterial financial interest that could unduly influence investment or administrative decision-making.
  - 3.1.6. maintains relationships with product suppliers, clients, or third parties that create bias in fund selection, asset allocation, or fee structures.
  - 3.1.7. participates in dual roles, external engagements, or financial interests in counterparties that may compromise fiduciary responsibilities.
- 3.2. The primary responsibility for the identification of a Conflict of Interest rests with the Representatives, employees, and individual members of the of the Group. Throughout the process of rendering a financial service to a client, a Representative must apply his or her mind to whether there is:
- 3.2.1. Any situation that exists that influences the objective performance of the Representatives' obligations to the client.
  - 3.2.2. Any situation that exists that prevents the Representative from rendering an unbiased and fair financial service to the client.
  - 3.2.3. Any situation that exists that prevents the Representative from acting in the best interest of the client.
  - 3.2.4. A situation caused as a result of an actual or potential relationship with a Third Party.
  - 3.2.5. A situation caused by an actual or potential financial or Ownership Interest.
- 3.3. In the event that any of the abovementioned situations exist, an actual or potential Conflict of Interest will have been identified.
- 3.4. The Group has implemented the following internal controls to identify actual or potential Conflicts of Interest that may arise:
- 3.4.1. Annual reviews are conducted on all contracts held with Third Parties in order to assess whether the contractual relationship in any way influences the FSP's objective performance towards its clients, the FSP's ability to render fair and unbiased financial services towards its clients, or the FSP's ability to act in the best interest of the client.
  - 3.4.2. Annual reviews are conducted on all relationships where an Ownership Interest exists between the FSP and a third party. The purpose of the review is to assess whether the relationship in any way influences the FSP's ability to render fair and unbiased financial services towards its clients.
  - 3.4.3. Conflict of Interest declarations are signed by all relevant personnel on an annual basis. The purpose of collecting Conflict of Interest declarations is to assist the FSP and the compliance officer to identify actual or potential Conflicts of Interest.
- 3.5. All relevant personnel (Key Individuals and Representatives) are required to immediately disclose in writing to the Group compliance officer, any actual or potential conflicts of interest as soon as they become aware of such situation.

## 4. GIFTS

- 4.1. In dealing with customers, suppliers and intermediaries, the Group, does not encourage the excessive giving or receiving of gifts (i.e. gifts exceeding R1 000 in value), be they cash or other items.
- 4.2. The FSP may only receive or offer the following Financial Interest from or to a third party that is:
  - 4.2.1. An immaterial Financial Interest. This is defined as a Financial Interest with a determinable monetary value, the aggregate of which does not exceed R1 000 in any calendar year from/to the same Third Party in that calendar.
  - 4.2.2. A Financial Interest not referred to above, for which a consideration, fair value or remuneration that is reasonably commensurate to the value of the Financial Interest, is paid by that provider or Representative at the time of receipt thereof.
- 4.3. A provider may not offer any Financial Interest to a representative of that financial services provider for:
  - 4.3.1. Giving preference to the quantity of business secured for the provider to the exclusion of the quality of the service rendered to clients.
  - 4.3.2. Giving preference to a specific product supplier, where a Representative may recommend more than one product supplier to a client.
  - 4.3.3. Giving preference to a specific product of a product supplier, where a Representative may recommend more than one product of that product supplier to a client.
- 4.4. The FSP maintains a Gift Register. All gifts received from a third party with an estimated value of R1 000 or more will be recorded in the Gift Register ([Annexure 1](#)).
- 4.5. Appointed Group Representatives and Key Individuals are required to sign an annual declaration confirming that they are not aware of any actual or potential conflict of interest which has not been brought to the attention of the compliance officer ([Annexure 2](#)).

## 5. COMPLIANCE

- 5.1. The Group's GRC function is established as part of its risk management framework.
- 5.2. It is the responsibility of all employees and Representatives of the Group to maintain the good name and standing of the Group by conducting themselves professionally and in accordance with all rules, regulations and legislation which govern the Group as a whole.
- 5.3. Compliance with all rules, regulations and legislation is the individual responsibility of each employee. Each employee and or Representative must accept personal responsibility for behaving correctly and in accordance with this policy. Likewise, each employee and Representative is obliged to stop or prevent any actions that are contrary to the content of this policy and which could damage or harm the Group.
- 5.4. Non-compliance with this policy will be subject to disciplinary procedures and necessary action will be taken against the offending employees and Representatives. This may result in the debarment and/or dismissal of the employees and Representatives.
- 5.5. Avoidance, limitation or circumvention of this policy through whatever means will also be seen as non-compliance.

## 6. MEASURES AIMED AT AVOIDING OR MITIGATING CONFLICT OF INTEREST

- 6.1. The Group employees and Representatives should avoid engaging in activities which will result in a Conflict of Interest.
- 6.2. If a Group employee and/or Representative realise that there is a potential or actual Conflict of Interest, the employee and/or Representative must, timeously and fully disclose any such potential or actual existence of a conflict to the Group by making a report to their immediate superior.
- 6.3. Should the immediate superior be related in any way to the suspected Conflict of Interest, the employee is to make the report directly to management. This will enable the Group to decide whether or not to engage with the employee/transgressor in question.
- 6.4. The Group employees and Representatives who are faced by what is clearly a Conflict of Interest situation, must desist from continuing with any participation in such a situation or activity.
- 6.5. Should any employee and or Representative not be certain about an intended transaction of theirs being a possible transgression of this policy, the employee must approach the Group's GRC Department, who will evaluate the intended transaction and give guidance.
- 6.6. Specific monetary measures should be focused on the following:
  - 6.6.1. Commissions authorised in terms of applicable legislation;
  - 6.6.2. Fees authorised in terms of applicable legislation, or fees or remuneration for services rendered to a third party (if those fees are reasonably commensurate to the service being rendered);
  - 6.6.3. Fees for the rendering of a service in respect of which commission or fees above is not paid, if those fees are specifically agreed to by a client in writing and may be stopped at discretion of the client;
  - 6.6.4. A limited immaterial Financial Interest as defined; and
  - 6.6.5. A Financial Interest for a consideration or fair value that is reasonably commensurate to the value of the Financial Interest that is paid by the provider or Representative at time of receipt thereof.
- 6.7. The measures the Group have adopted to manage identified conflicts are considered appropriate, given the current efforts of the Group to act impartially and avoid materially harming a client's interest when managing Conflicts of Interest. Further information on the measures in question is detailed below:
  - 6.7.1. **Procedures:**

The Group have adopted appropriate procedures throughout the business structure to manage potential Conflicts of Interest. Representatives, and employees receive guidance and training in these procedures, and they are subject to monitoring and review processes. There are specific measures and consequences in place for non-compliance with the Conflict of Interest policy.
  - 6.7.2. **Confidentiality:**

The Group's Representatives and employees respect the confidentiality of client information and as such, no such information may be disclosed to a third party without the written consent of a client.

**6.7.3. Monitoring:**

The Key Individual or compliance officer in charge of supervision and monitoring of this policy will regularly provide feedback on all related matters. The policy shall be reviewed on an annual basis.

**6.7.4. Disclosure:**

Where there is no other way of managing a conflict, or where the current measures do not sufficiently protect clients' interests, the conflict must be disclosed to the affected client(s). This will allow affected clients to make an informed decision on whether to continue using the services of the Group, given the current situation. In all cases, where appropriate and where determinable, the monetary value of non-cash inducements will also be disclosed to affected clients.

Disclosure alone will not be enough and must be treated as an integral part of managing Conflicts of Interest. The Group is therefore committed to ensure that clients are fully informed about actual or potential Conflicts of Interest in relation to the provision of financial services. In this regard, the FSP has adopted the following disclosure measures:

- i. The FSP shall disclose to a client any Conflict of Interest in respect of that client.
- ii. The disclosure shall be made in writing at the earliest reasonable opportunity.
- iii. The disclosure may be communicated by way of appropriate electronic media.
- iv. The disclosure shall include the nature of any relationship or arrangement with a Third Party that gives rise to a Conflict of Interest.
- v. The disclosure shall be made in sufficient detail to enable the client to understand the exact nature of the relationship or arrangement and the Conflict of Interest.
- vi. The disclosure shall include the measures taken to avoid or mitigate the conflict.
- vii. The disclosure shall include any Ownership Interest or Financial Interest, other than an immaterial Financial Interest, that the Group or Representative may be or become eligible for.
- viii. The disclosure shall include a reference to the Conflict of Interest Management Policy and how it may be accessed.

**6.7.5. Publication:**

The Group will publish the Conflict of Interest management policy in appropriate media and ensure that it is easily accessible for public inspection at all reasonable times.

**6.7.6. Report:**

The FSP, compliance officer or Key Individual will include a report on the Conflict of Interest management policy in the annual and bi-annual FAIS compliance reports submitted to the Registrar.

## **7. MANAGEMENT MEASURES**

- 7.1. The Group will create awareness and knowledge of applicable stipulations as contained in the General Code of Conduct and other relevant legislation relating to Conflicts of Interest. Such awareness and knowledge shall be made available through training and educational material.

- 7.2. The Group will ensure that this policy is understood and that all Conflict of Interest management measures will be adopted by all Group directors, Representatives and employees.
- 7.3. The Group will conduct regular inspections on all commissions, remuneration, fees, and Financial Interests proposed or received in order to avoid non-compliance.

## **8. GROUP ASSOCIATES & OWNERSHIP INTEREST**

- 8.1. In order to ensure transparency, the Group maintains and discloses:
  - 8.1.1. a list of all its associates
  - 8.1.2. a list of any third parties in which it holds an ownership interest
  - 8.1.3. a list of any third parties that hold an ownership interest in the Group
- 8.2. Information relating to the associates and Ownership Interests of the Group are contained in the Group's organogram, or on request from the GRC Department.

**ANNEXURE 1 – GIFT REGISTER TEMPLATE**

<b>GIFT REGISTER</b> <b>Gifts, Benefits &amp; Hospitality Received</b>			
<b>Date of Receipt</b>	<b>Description of Gift</b>	<b>Person/Organization Offering Gift</b>	<b>Value of Gift</b>
			R-

## **ANNEXURE 2 – DECLARATION OF IMMATERIAL FINANCIAL INTEREST**

### **Staff Declaration of Immaterial Financial Interests**

I, **(full name and surname of employee)**, hereby confirm that I have not accepted any financial interest exceeding a monetary value of R1,000 in the last calendar year from any one product supplier or from any other third party, as defined in the General Code of Conduct.

I hereby confirm the following:

1. I understand that the receipt of any financial interest can give rise to a conflict of interest that may be prejudicial to the Group.
2. I fully understand that I must disclose the receipt of any financial interests to the management of the Group who will evaluate the nature of the financial interest and decide on a course of action which may include the return of the Reward to the sender.
3. I understand that the failure to follow the above conflicts procedures could compromise the integrity and reputation of the Group.
4. I acknowledge that I understand the above declaration and realise that failure to comply with the relevant internal procedures could after due process, lead to disciplinary steps and possibly, the termination of my employment and or debarment.

**Signed at..... on .....20....**

\_\_\_\_\_  
**[Employee Signature]**