

CONFLICT OF INTEREST MANAGEMENT POLICY

FSP: 54286

Purpose:	The FSP seeks to adopt measures to avoid, identify, and disclose Conflicts of Interest and to set out the process, procedure, and internal controls to facilitate compliance with the Policy. It will also highlight the consequences of non-compliance with the policy.
Governance:	This policy must be approved by the Board of Directors. The Key Individual is the owner of the policy.
Status Of Policy:	Implemented
Last Revision:	4 October 2024
Effective Date:	4 October 2024
Next Revision:	30 September 2025
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1. APPLICABILITY

This policy applies to PWN CONSULT and its representatives. All directors, officers, employees, and representatives of the FSP are required to comply with this Policy.

This policy will not address every conflict of interest situation that may arise but serves as a guide as to what constitutes a conflict of interest, the process and procedure in place to facilitate compliance, and the consequences of non-compliance.

The Policy is intended to assist employees in making the right decisions when confronted with a potential conflict of interest.

2. LEADERSHIP

The Company's Board of Directors oversees the business of the Company, including the compliance with all applicable legislation, and this Policy. Management plays a key role in the application of this Policy and is expected to demonstrate their personal commitment to this Policy and ensure compliance by employees. Management is obliged to maintain a workplace environment that nurtures and ensures compliance with this Policy.

3. IDENTIFICATION OF CONFLICTS OF INTEREST

Conflict of interest means any situation in which a provider or a representative has an actual or potential interest that may, in rendering a financial service to a client may:

- Influence the objective performance of this, her or its obligations to that client; or
- Prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interest of the client, including but not limited to a financial interest, an ownership interest, or any relationship with a third party.

Financial Interest means any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive, or valuable consideration.

Any non-cash incentives offered or indirect consideration payable by another provider, supplier, or person to the provider could be viewed as a potential conflict of interest.

4. HOW TO AVOID CONFLICT OF INTEREST

The guiding principles of this Policy are that the FSP and its representatives must, when rendering an intermediary service, act honestly, fairly, with due skill, care, and diligence. There must be due regard to the client's interest and the FSP's integrity at all times.

If any employee is in doubt as to whether a particular conduct amounts to a conflict of interest or not, that employee must contact his manager or Key Individual for clarity and guidance.

5. DISCLOSE CONFLICT OF INTEREST

A conflict of interest should be disclosed to customers at the earliest reasonable opportunity in writing on the Record of Advice to the customer, including measures taken to avoid or mitigate the conflict, as well as a detailed description of the relationship causing the conflict.

Key Individuals and Representatives must annually declare if any conflict of interest exists and this must be placed on record by the Key Individual.

Based on the feedback on the declaration and disclosures to customers, the Key Individual must review any conflict of interest to avoid this in the future or implement the necessary mitigating actions.

6. HOW TO COMPLY

- Avoid engaging in activities that will result in a conflict of interest;
- Inform all customers of the conflict of interest policy and how they access it on the Record of Advice;
- Report any conflict of interest to your Key Individual immediately;
- Registered representatives must report any offering of financial interest from a 3rd party to the Key Individual immediately and desist from continuing with the transaction;
- Record all immaterial interests in the company Immaterial Financial Interest Register;
- All gifts above a value of R500.00 should not be accepted and reported to the Key Individual;
- No direct remuneration from any third party is allowed.

7. CONSEQUENCE OF NON-COMPLIANCE

Depending on the severity of non-compliance, the following actions can be taken:

- Written warning;
- Training;
- Dismissal or debarment in the case of a representative .

8. WHAT FINANCIAL INTEREST MAY BE RECEIVED?

Commissions authorised under the Long-term Insurance Act or the Short-term Insurance Act.

9. HOW TO DEAL WITH AN IMMATERIAL FINANCIAL INTEREST?

Immaterial financial interest means any financial interest with a determinable monetary value, the aggregate of which does not exceed R1,000.00 in any calendar year from the same third party in that calendar year received by a representative for that representative's direct benefit and a provider, who for its benefit or that of some or all of its representatives, aggregates to the immaterial financial interest paid to its representative.

A proper record must be kept of all immaterial financial interest received in the **Immaterial Financial Interest Register**. The Key Individual is responsible for maintaining this register.

10. INTERNAL PROCEDURES

The FSP enters into service provider agreements (intermediary agreements) on behalf of the FSP. Only once the agreement has been approved, the products will be loaded on the electronic platform. No approved products may be offered to customers.

If any product or service provider approaches a representative to offer any financial interest for regulated or unregulated products, the offer must be declined and reported to the Key Individual for further investigation. All commissions will be paid to the FSP, and the representative will be remunerated by the FSP.

To ensure that our customers are fully protected from undue and uncompetitive behaviour by a product supplier, the FSP may not offer a financial interest to a representative for:

- giving preference to quantity of business placed to the exclusion of quality of service rendered to the client;
- preferring one product over another where more than one product could be offered;
- preferring a specific product of a product supplier, where a representative may recommend more than one product supplier to a client.