

Conflicts of Interest Management Policy

Effective Date: 1 September 2018

Welcome.

Wealth Planners (Pty) Ltd is an FSCA licensed independent financial planning practice registered as a financial services provider (FSP) number 37933 and has been mindfully partnering with clients since 2009.

The General Code of Conduct for Financial Services Providers and Representatives (the "Code") published in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002 ("FAIS"), requires every FSP to adopt, implement and maintain a Conflict of Interest Management Policy.

All employees of Wealth Planners must perform their duties independently and act in the best interests of Wealth Planners' existing and potential clients.

A summary of this Policy is included in the Letter of Introduction/Disclosure document, given and explained to clients at the start of the relationship. This Policy applies to all employees of Wealth Planners.

What is a conflict of interest and when may it arise

A conflict of interest may arise where a company, or one of its employees, is providing a financial service to its clients and may entail a material risk of damage to those clients' interests, and whether the company or its employee:

- is likely to make a financial gain, or avoid a financial loss, at the expense of a client; or
- has an interest in the outcome of a service provided to a client or of a transaction carried out on behalf a client, which is distinct from a client's interest in that outcome; or
- has a financial or other incentive to favour the interest of one client (or group of clients), over the interests of another client (or group of clients); or
- carries on the same business as a client; or
- receives or will receive from a person other than a client, an inducement in relation to a service provided to a client, in the form of monies, goods or services, other than the standard commission or fee for that service.

How do we manage conflicts of interest

Wealth Planners has no shareholding in any product supplier.

The following are examples of conflicts of interest and how conflicts of interest are managed by Wealth Planners:

Contracts, proposed contracts and similar transactions or arrangements

A conflict of interest may arise where an employee has a direct, or indirect interest in a transaction. This may be where an employee has a connection with the other party in a transaction, or where the employee's family has a connection. The connection may be from a directorship, significant shareholding, employment or consultancy.

Wealth Planners requires disclosure of any connection which could (or could be seen to) have the effect of compromising the judgment of an employee. An employee is required to notify Wealth Planners of any such potential conflicts of interest, who will then decide if an employee can be involved in a transaction. Also, Wealth Planners will ensure that the relevant provisions have been met.

Gifts, Hospitality & Inducements

Inducements, gifts and hospitality are all issues that could lead to potential Conflicts of Interest. Wealth Planners has a strict policy regarding such issues. An employee must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest. An employee must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise Wealth Planners integrity. A register is kept of any gifts, or hospitality received. An employee cannot attend hospitality events, without the approval of Wealth Planners. Where an invitation could be construed as being a business inducement, it must be declined.

What do we expect from employees

Wealth Planners expects all its employees to maintain the highest standards in carrying out their business activities, adhering to legislative requirements and our policies on business conduct. Wealth Planners expects its employees to act professionally, honestly and ethically in all their dealings with clients, colleagues and third parties. Wealth Planners has a clear policy on Conflicts of Interest:

- Conflicts (or potential conflicts) of interest are inherent in any business, and therefore it is not the aim of Wealth Planners to avoid all conflicts, but rather to take steps to identify and manage conflicts of interest to ensure clients are not unduly prejudiced.
- Conflicts (or potential conflicts) of interest must always be disclosed. Wealth Planners will not tolerate non-disclosure by an employee.