

PARTNER RISK Solutions (Pty) Ltd [the Company]
FSP No. 48214

FAIS

CONFLICT OF INTEREST MANAGEMENT POLICY

1. PREAMBLE

This Policy is intended to comply with the relevant provisions of the Financial Advisory and Intermediary Services Act ("FAIS and the General Code of Conduct, as well as good sound business practice.

2. POLICY STATEMENT

The Company is committed to conducting its business in an ethical, fair and honest manner, in order to manage and maintain the interests of our clients and the Insurance Industry, as contained in this FAIS Conflict of Interest Management Policy

3. OBJECTIVE

Employees of the Company must ensure that they will not permit their personal interests to conflict with the interests of the Company's clients.

This will include but is not limited to;

- Direct or indirect financial gain resulting from recommendations;
- Effecting a transaction and/or product that may result in a benefit to another party other than the client.

4. DECLARATIONS

Employees are obliged to disclose any situation where an actual or potential conflict of interest relates to their employment, which consequently shall or may have an adverse effect on the Company's relationship with the client.

Where an employee suspects an actual or potential conflict of interest, the employee shall be obliged to immediately disclose the matter to his/her line manager.

5. MANAGEMENT OF CONFLICT OF INTEREST

5.1 Mechanisms for identification of conflicts of interest

Prior to finalisation of prospective business offerings, the Company will identify and assess whether there exists a potential conflict of interest. The line manager will, in assessing the potential conflict of interest, take due consideration of the impact that such a conflict of interest will have on the Company's relationship with the client.

From time to time, line managers and/or other members of management will assess current business engagements in order to identify any actual or potential conflict of interest.

5.2 Measures for the avoidance and mitigation of identified conflicts of interest

Where an actual or potential conflict of interest is identified during business engagements, the line manager will immediately assess and consult with executive management.

If suitable measures of avoidance are not possible, the line manager and executive management, and where necessary the Board of Directors will establish appropriate measures to mitigate and manage the identified conflict of interest.

All decisions made must be reduced to writing and kept for a minimum period of 7 (seven) years or further until such conflict of interest ceases to exist.

5.3 Measures for the disclosure of Conflicts of Interest

Where an actual or potential conflict of interest is identified, a Company executive or a mandated employee, together with the intermediary will ensure that the conflict of Interest is reported in writing to the client within a reasonable period.

The report will set out a description of the conflict of interest, as well as the impact and the appropriate measures to mitigate, manage and eradicate the conflict of interest.

The client may choose to continue to pay the insurance premium and remain on cover, if they so desire, notwithstanding the conflict of interest.

5.4 Immaterial Financial Interest

An immaterial financial interest is deemed permissible where there is a financial interest with a determinable value of not more than one thousand rands (ZAR 1,000) per annum.

6. GENERAL

The Company's Board monitors the implementation of this policy and oversees the governance, risk and compliance systems, including relevant training and awareness of the Conflict of Interest Management Policy.

Failure by an employee to adhere to the provisions of this policy or the monitoring thereof will result in appropriate disciplinary action.

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