

The Financial Alliance (Pty) Ltd – Conflict of Interest Management Policy

Last updated: October 2025

Authorised Financial Services Provider (FSP 6561)

1. Purpose

The purpose of this Conflict of Interest Management Policy (“the Policy”) is to ensure that The Financial Alliance (Pty) Ltd (“TFA”) identifies, manages, and mitigates any actual or potential conflicts of interest in the conduct of its business as required by the Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS Act) and the General Code of Conduct for Authorised Financial Services Providers.

2. Scope

This Policy applies to all directors, officers, representatives, employees, and any other persons acting on behalf of TFA. It covers all business interactions and relationships that may give rise to a conflict between the interests of TFA, its staff, and those of its clients.

3. Definition of a Conflict of Interest

A conflict of interest exists when a financial or other interest may influence, or appear to influence, the objective performance of a representative’s duties or the fair treatment of a client. Conflicts can be actual, potential, or perceived and may arise in various forms, including remuneration, ownership interests, or personal relationships.

4. Identification of Conflicts

TFA identifies potential conflicts of interest through ongoing monitoring of business practices, remuneration structures, and product supplier relationships. Examples of conflicts may include:

- Receiving additional remuneration or incentives from product providers;
- Holding ownership or financial interests in product suppliers;
- Providing preferential treatment to certain clients or suppliers;
- Accepting gifts or hospitality that could influence advice given to clients.

5. Managing Conflicts of Interest

TFA manages conflicts through the following measures:

- Maintaining transparent and fair remuneration structures;
- Avoiding situations where conflicts cannot be effectively managed;
- Disclosing material conflicts to clients in writing before providing advice or intermediary services;
- Implementing staff training and awareness programs on ethical conduct and conflicts of interest;

- Regularly reviewing relationships with product providers to ensure objectivity and client-first outcomes.

6. Disclosure of Conflicts

All material conflicts of interest must be disclosed to clients in writing prior to providing financial advice or intermediary services. Disclosures will include the nature of the conflict, its potential impact, and the steps taken to mitigate it. Clients will be informed that they may request additional information or clarification where necessary.

7. Gift, Gratification, and Benefit Register

TFA maintains a Gift and Benefit Register where all staff must record any gifts, hospitality, or non-cash benefits received from product providers, clients, or other third parties. The following rules apply:

- No staff member may accept a gift or benefit that could influence, or appear to influence, their independence or objectivity.
- All gifts exceeding a reasonable nominal value must be declared in writing to the Compliance Officer within five (5) working days.
- The Compliance Officer will maintain the register and review it periodically to identify potential patterns or risks.
- Any non-permitted benefits must be returned or declined.

8. Roles and Responsibilities

The Directors and Compliance Officer of TFA are responsible for overseeing the implementation, monitoring, and enforcement of this Policy. They will ensure that all representatives understand their duties and that any potential conflicts are escalated and addressed appropriately.

9. Training and Awareness

All representatives and employees of TFA receive training on this Policy and on ethical business practices during induction and annually thereafter. Training ensures that staff remain aware of their responsibilities under the FAIS Act and the General Code of Conduct.

10. Recordkeeping

TFA will keep and maintain records of all conflicts identified, disclosures made to clients, and entries in the Gift and Benefit Register. These records will be retained for a minimum period of five (5) years or as otherwise required by law.

11. Review of Policy

This Policy will be reviewed at least annually by the Directors and the Compliance Officer to ensure ongoing relevance, compliance with legislation, and effectiveness in managing conflicts.

12. Approval

Approved by: The Board of Directors and Information Officer

The Financial Alliance (Pty) Ltd

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