

# CONFLICT OF INTEREST MANAGEMENT POLICY



## BRUVOS cc – FSP 4877

This Conflict of Interest Management Policy has been drafted in accordance with the requirements of Board Notice 58 of 2010, which amends the General Code of Conduct for Financial Services Providers and Representatives.

## WHAT IS CONSIDERED TO BE A CONFLICT OF INTEREST?

In terms of the General Code of Conduct as amended, a conflict of interest may occur when a Financial Service Provider ("FSP"), when rendering a financial service to a client, does not act objectively, does not render an unbiased or fair service or does not act in the client's interest. This may happen when the FSP has an actual or potential financial or ownership interest in the client's affairs or has a relationship with a third party or product supplier.

## POLICY STATEMENT

The director, shareholder, managers and employees of **Bruvos cc**, fully understand the provisions of the General Code of Conduct as amended by Board Notice 58 of 2010 and commit themselves to the comply with said provisions, the company will at all times avoid, or where this is not possible mitigate any conflict of interest that may arise.

## CONFLICT OF INTEREST DISCLOSURE

**Bruvos cc**, has business relationships with other entities that are all licensed Financial Services Providers. Please see the attached addendum for the full list of insurers.

## AREAS OF CONFLICT OF INTEREST OR POTENTIAL CONFLICT OF INTEREST

### General

A financial interest includes cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive, or valuable consideration, other than:

- a) An ownership interest;
- b) Training by a product supplier on products, general financial and industry information and technological systems, that is not exclusively available to a selected group of providers or representatives except for travel and accommodation associated with that training.

Where the amount of this interest does not exceed R1 000 in aggregate to the FSP, including all its representatives and key individuals, it is considered an immaterial financial interest.

An ownership interest includes:

- i) any equity or proprietary interest for which a fair value was paid on acquisition, other than such an interest held by a nominee
- ii) any dividend, profit share or similar benefit derived from such interest.

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## Specific

In accordance with section 3A(1)(a) of the General Code of Conduct, **Bruvos cc**, confirms it, or its representatives will only offer or receive financial interest to or from a third party in the form of:

- i) Commission authorised under the Short Term Insurance Act, 53 of 1998;
- ii) Fees for the rendering of a financial service in respect of which commission is not paid, if such fees are specifically agreed to by a client in writing and may be stopped at the client's discretion;
- iii) Fees or remuneration for the rendering of a service to a third party, which fees are reasonably commensurate to the service being rendered;
- iv) Subject to any other law, an immaterial financial interest.

## Personal interests

In accordance with section 3A(1)(b) of the General Code of Conduct, **Bruvos cc**, confirms that it will not offer any financial interest to its key individuals or representatives for:

- i) Giving preference to the quantity of business secured for **Bruvos cc**, from any other independent Financial, Services Provider.
- ii) Giving preference to a specific product supplier, with who it holds a mandate.

Furthermore; **Bruvos cc**, will discourage involvement of its staff in any paid employment outside the company. Any activities of staff aimed at generating profit or income outside of the company must be applied for and approved by **Bruvos cc**, in writing in advance.

## Gifts and other valuable benefits

No employee of **Bruvos cc**, is allowed to accept gifts or other tangible or intangible benefits in excess of R1'000.00 from any third party for his / her business activities. A gift in excess of R1'000.00 that cannot be easily declined due to nature of the business relation must be approved by the Director, member of or key-individual (as appropriate) of **Bruvos cc**, before it is accepted.

The following will apply in the event that gifts are received.

- The value of such gift must be the fair market value thereof.
- Where the value of such gift is less than R1'000.00 it may be accepted but it must be entered into the "*Conflict of Interest & Gifts Register*" held by **Bruvos cc**.
- The value of multiple gifts received in any one calendar year may not exceed R1'000.00 or prior (Director, member's, key-individual's) approval must be obtained.

Provided that it relates to standard and accepted business practice, invitations to business lunches / dinners, product launches, award ceremonies, sport events and other social events may be accepted provided it conforms to standard business practice and a **Bruvos cc Representative** or **Key Individual** is present.

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## INTERNAL PROCEDURES

To ensure compliance with this Conflict of Interest Management Policy, **Bruvos cc**, have set up the following internal procedures:

- a) All key individuals, representatives, employees and others are required to read Board Notice 58 of 2010 as well as this Conflict of Interest Management Policy and to sign a statement to the effect that they have done so and fully understand the provisions of both documents and the application thereof.
- b) Training on this Conflict of Interest Management Policy will be provided by the company's Compliance officer either as part of general FAIS training or specifically.
- c) Key Individuals will conduct ad hoc checks on business transactions to ensure this Conflict of Interest Management Policy has been complied with.
- d) The Compliance Officer will report on this Conflict of Interest Management Policy in the annual compliance report.
- e) Avoidance, limitation or circumvention of this Conflict of Interest Management Policy via an associate will be deemed non-compliance.
- f) Any key individual, representative, employee or other shall be required to report to the Legal Department, alternatively to the company's compliance officer, any potential conflict of interest as soon as is reasonably possible after becoming aware of such conflict of interest.
- g) Non-compliance will be subject to disciplinary procedures in terms of FAIS and employment conditions and can ultimately result in debarment or dismissal as applicable.
- h) In the event that **Bruvos cc**, recognise the existence of a material conflict of interest, it shall notify affected clients thereof as soon as is reasonably possible and shall immediately take steps to avoid such conflict of interest.
- i) Should, however, a conflict of interest arise which cannot be avoided, **Bruvos cc** shall immediately disclose in writing the nature and extent of the conflict of interest and any possible steps that may be taken to mitigate the conflict, and where applicable, afford the affected client/s the opportunity of reviewing their decision to use or continue to use its services.