

Aspire Financial Services (Pty) Ltd

CONFLICT OF INTEREST MANAGEMENT POLICY

The General Code of Conduct for the Financial Advisory and Intermediary Services Act (FAIS), broadly covers conflict of interest between Financial Product Providers and Financial Service Providers. The code requires that FSP's disclose the existence of the actual or potential conflict of interests to clients.

Conflict of Interest means any situation in which a provider or representative has actual or potential interest that may, in rendering a financial service to a client influence the objective performance of his obligations to that client and/or prevent a provider or representative from rendering an unbiased and fair financial service to that client or from acting in the interest of that client.

Aspire Financial Services (Pty) Ltd ("Aspire") has adopted and implemented a Conflict of Interest Management policy to ensure that it meets its obligations in terms of the FAIS ACT. The COI Management policy has been drafted to include the following:

- Mechanisms for identification of conflict of interest
- Measures for the avoidance of conflict of interest
- Measures for the disclosure of conflict of interest
- Processes and procedures and internal controls
- Consequences of non-compliance

Mechanisms for identification of conflict of interest

Management Meetings will take place once a month, conflict of interest matters will be an item on the compliance agenda and reviewed at least on an annual basis.

Mechanisms for the avoidance of COI

Full disclosure throughout financial planning process, in addition to this internal protocols, an example would be to provide options and alternatives and disclosure.

This is an integral part of the financial planning process. Any conflict of interest will be disclosed in the disclosure notice, service level agreement/terms of engagement, proposal and record of advice.

Conflict of Interest Processes

Reviewed by management and external compliance practitioner at least annually.

Procedures to facilitate compliance with policy

Staff to meet minimum operating standards in this regard. In addition to this, Key Individuals are required to sample files as a part of quality control.

Codes of conduct on files check for COI. This ensures that the person acting as intermediary and/or advisor is checking themselves at point of sale.

Internal Controls

Key Individuals to sign off the policy and implement with business process. Employees to be made fully aware of Conflict of Interest Policy through awareness training.

Consequences for non-compliance

Aspire will implement disciplinary process as detailed in the Human Resources Policy.

A provider or its associates or representatives may not receive any financial interest from a third party or offer any financial interest to a third party if the primary purpose of receiving or offering the financial interest is to incentivise or reward for monetary obligations assumed or maintained by a client, directly or indirectly, in favour of that provider, its associates or its representatives, or a third party, other than –

- (i) Subject to any other law, commission or fees directly payable in cash to the provider; and
- (ii) subject to any other law, an inconsequential financial interest.

Financial interest

The representative shall disclose to the client the existence of any personal interest in the relevant service, or of any circumstance which gives rise to an actual or potential conflict of interest in relation to such service, and shall take all reasonable steps to ensure fair treatment of the client;

- b. The representative undertakes to avoid and where this is not possible, mitigate any conflict of interest between the representative and the client.
- c. The representative undertakes to disclose to the client in writing at the earliest reasonable opportunity:
 - (i) any conflict of interest in respect of that client, including the measures taken in accordance with the conflict management policy of the provider to avoid or mitigate the conflict;
 - (ii) any ownership or financial interest, other than an immaterial financial interest, that the employer or representative may be or become eligible for;
 - (iii) the nature of any relationship or arrangement with a third party that gives rise to a conflict of interest, in sufficient detail so as to enable the client to understand the exact nature of the relationship or arrangement and conflict of interest; and
- d. The representative undertakes to inform the client of the employer's conflict of interest management policy and how it may be accessed.
- e. The employee undertakes to adopt, maintain and implement a conflict of interest management policy and to provide the representative with appropriate training and educational material in this regard.

List all associates and third parties and the nature or extent of ownership interest:

- List of associates:

Name	Relationship
n/a	

- Ownership interests in third parties:

Name	Nature of interest	Extent of interest
n/a		

- Third parties with ownership interest in provider:

Name	Nature of interest	Extent of interest
n/a		

Conflict of Interest Training

The management team will ensure that all employees, representatives and associates have attended awareness training registers will be updated as part of the Risk Management Plan thus ensuring all reasonable measures have been taken to inform and train employees, representatives and associates on Conflict of Interest Management Policy.

Training/ educational material

Conflict of Interest education material is provided in a powerpoint format and staff attend a classroom style training session once a year. This is followed by an online assessment(ad-hoc) conducted by the external compliance officer

Monitoring

Crux Consulting CO3485, will monitor the management of the policy and training registers on an annual basis. The board will include any findings of non-compliance at Annual General Meeting.

Published in appropriate media

In terms of Aspire's conflict of interest policy all communication to this effect will be updated on our marketing documentation including disclosure notices.