



i capital Risk Services (Pty) Ltd

Financial Advisory and Intermediary Services Act, No. 37 of 2002

Conflict Of Interest Management Policy
("COIMP") AND
Conflict Of Interest
("COI")

For

FSP NAME: i capital Risk Services (Pty) Ltd

FSP # : 19819

- 1.1 It is our policy that, we or our representatives may only receive or offer the following financial interest from or to a third party:
 - 1.1.1 commission authorised under the Short-term Insurance Act, 1998 (Act No. 53 of 1998);
 - 1.1.2 fees authorised under the Short-term Insurance Act, 1998 Act No. 53 of 1998), if those fees are reasonably commensurate to a service being rendered;
 - 1.1.3 fees for the rendering of a financial service in respect of which commission or fees referred to above are not paid, if those fees –
 - 1.1.3.1 are specifically agreed to by a client in writing; and
 - 1.1.3.2 may be stopped at the discretion of that client;
 - 1.1.4 fees or remuneration for the rendering of a service to a third party, which fees or remuneration are reasonably commensurate to the service being rendered;
 - 1.1.5 subject to any other law, an immaterial financial interest; and
 - 1.1.6 a financial interest, not referred to above, for which a consideration, fair value or remuneration that is reasonable commensurate to the value of the financial interest, is paid by that provider or representative at the time of receipt thereof.
- 1.2 We (or any associate) may not pay or receive any financial interest or have an ownership interest or have a relationship with a third party which would constitute a COI as defined above.
- 1.3 We and our representatives must avoid (or mitigate where avoidance is not possible) any COI between us and a client or our representatives and the client.
- 1.4 Non-cash incentives offered and/or other indirect consideration payable by another provider, a product supplier or any other person or third party to us or any representative or by any of us would be viewed as a COI. Receipt or payment of any such consideration is in breach of our policy.

- 1.5 We may not pay incentives to representatives which constitute a COI
- 1.6 Undue preference may not be given to certain product suppliers or products created by product suppliers.
- 1.7 We or a third party may not offer any financial interest to a representative or us for giving preference to the quantity of business secured for us to the exclusion of the quality of the service rendered to clients, or for giving preference to a specific product supplier where a representative may recommend more than one product supplier to a client, or giving preference to a specific product of a product supplier, where a representative may recommend more than one product of that product supplier to a client.
- 1.8 Immaterial financial interests may be accepted provided it is approved by us and recorded in a gift and entertainment register which is monitored by our compliance officer.
- 1.9 We or any representative may not avoid, limit or circumvent (or attempt to avoid, limit or circumvent) compliance with the above through an associate or an arrangement involving an associate.

2. PROCESSES

- 2.1 Each representative is responsible for assessing all financial interests paid or received as well as any other interests and identifying any COI.
- 2.2 In addition, management will assess all financial interests paid or received by us as a provider and/or representatives and identify any COI. Any financial or other interest which constitutes a potential or actual COI, will not be allowed and must be avoided where possible.
- 2.3 All employees must disclose to us in writing all financial interests paid or received as well as any ownership interests. All financial and ownership interests (excluding immaterial financial interests) must be recorded in terms of this COIMP.

2.4 At the earliest reasonable opportunity, the provider/representative must, in writing-disclose to the client any COI in respect of that client, including

2.4.1 the existence of any personal interest in the relevant service; or

2.4.2 of any circumstance which gives rise to an actual or potential COI in relation to the service; and the provider must take all reasonable steps to ensure fair treatment of the client;

2.4.3 measures taken to avoid or mitigate the COI;

2.4.4 reasons for not being able to avoid the COI;

2.4.5 any ownership interest or financial interest;

2.4.6 the nature of the relationship or arrangements with a third party that gives rise to a COI in clear, concise and sufficient detail;

2.4.7 inform the client of the COIMP and how it may be accessed.

2.5 We will ensure that our employees, representatives and, where appropriate, associates are aware of the contents of this COIMP and will provide for appropriate training and educational material in this regard.

2.6 We will continuously monitor compliance with this COIMP and annually conduct a review of the COIMP. A person responsible for administering this COIMP will be formally designated.

2.7 This COIMP will form part of our risk management plan as well as of the compliance function.

2.8 We will publish this COIMP in appropriate media eg. our web-site and ensure that it is easily accessible for public inspection at all reasonable times.

3. CONSEQUENCES OF NON-COMPLIANCE WITH THE POLICY BY US AS PROVIDER, EMPLOYEES AND REPRESENTATIVES

In the event of non-compliance with this policy, in addition to any civil or criminal consequences, employees will be subject to disciplinary action

4. RESOLUTION

This COIMP was formally adopted originally at a meeting of i capital Risk Services (Pty) Ltd held at Sandton on 20 July 2011.

- A. Specify the type of and the basis on which a representative will qualify for a financial interest that the provider will offer a representative and motivate how that financial interest complies with the provisions of this COIMP.

None other than year end bonuses that may be paid at the discretion of management

- B. List of financial interests paid by provider to third parties.

None paid except in special circumstances which would be disclosed to all interested parties (Stat Notice)

- C. List of financial interests received by provider from third parties.

None

- D. List of all associates

None other than those companies which may be deemed to be associated intermediaries in view of the fact that i capital (Pty) Ltd holds an interest in such companies

- E. List of the nature and extent of any ownership interests held by the provider, representatives or associates in third parties.

None

- F. List of the nature and extent of any ownership interests held by third parties, representatives and associates in the provider.

i capital (Pty) Ltd holds 100% interest in i capital Risk Services (Pty) Ltd

- G. Gift and Entertainment register.

In force