Conflict Of Management Policy

Infinity Cover Solutions

hereinafter referred to as the "FSP"

Document Management

Document Name	Conflict of Interest Management Policy
Approved By	Shamanie Naidoo
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Policy Review & Updates - This policy must be reviewed annually or when there are regulatory changes affecting conflict of interest management. Updates must be approved by senior management or the board before implementation.

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Introduction and Purpose

In accordance with Section 3A (2) of the Financial Advisory and Intermediary Services Act (FAIS Act) 37 of 2002, every financial services provider (FSP), other than a representative, is obligated to implement, maintain, and enforce a robust conflict of interest management policy. This policy must align with the relevant provisions set forth in the FAIS Act to ensure transparency and fairness in the delivery of financial services.

As stipulated in the General Code of Conduct, both the FSP and its representatives must actively avoid conflicts of interest and, when avoidance is not feasible, take appropriate steps to mitigate them.

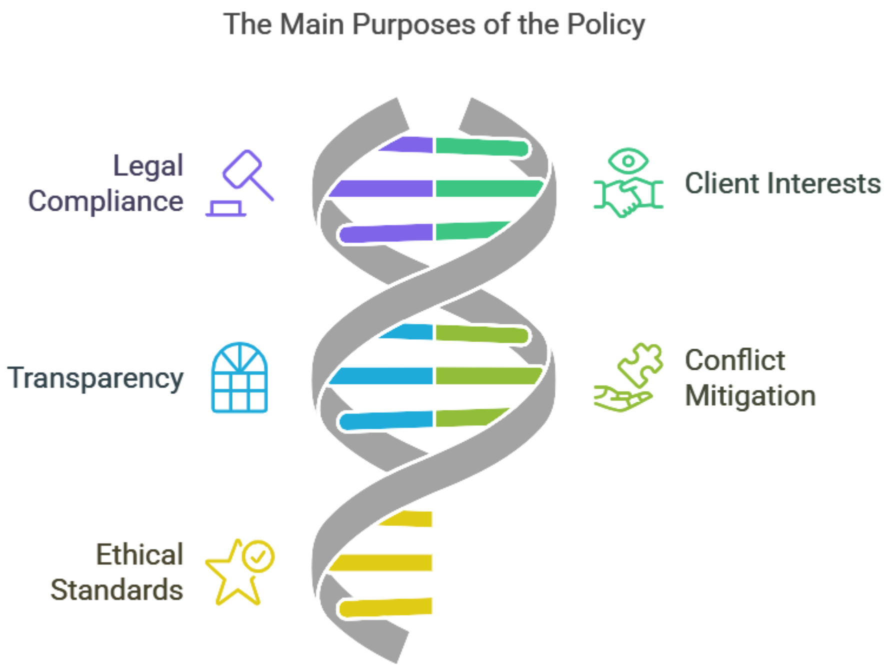
Our commitment to maintaining the highest standards of integrity means that we prioritize the interests of our clients above all else, ensuring that no personal or organizational interests interfere with the impartial advice and services we provide.

Where conflicts of interest cannot be completely avoided, we are dedicated to taking proactive measures to disclose, manage, and mitigate any actual or potential conflicts that may arise. To demonstrate our commitment to these principles, we have implemented this Conflict-of-Interest Management Policy, which provides clear guidelines for identifying, managing, and disclosing conflicts, in compliance with the requirements of the FAIS Act, as well as the General Code of Conduct.

- ✓ *This policy is designed to ensure that all potential or actual conflicts of interest are systematically monitored, controlled, and managed to safeguard the best interests of our clients, in line with our ongoing commitment to ethical conduct and regulatory compliance.*

Our main purposes of the policy:

- **Compliance with Legal Requirements**: Ensure adherence to the FAIS Act and the General Code of Conduct for Financial Services Providers.
- **Prioritizing Client Interests**: Ensure clients' interests are prioritized, preventing conflicts that may affect impartial advice.
- **Transparency and Disclosure**: Provide a framework for disclosing actual or potential conflicts, ensuring clients are fully informed.
- **Mitigation of Conflicts of Interest**: Offer clear processes to manage and mitigate conflicts, maintaining fairness in client interactions.
- **Maintaining Ethical Standards**: Uphold high ethical standards in all dealings with clients and stakeholders.
- **Regulatory Compliance**: Ensure compliance with the regulatory framework, including relevant amendments to the FAIS Act.
- **Protecting Client Trust**: Reinforce client trust by ensuring services are free from undue influence or bias.



Definitions

Term	Definition
Associate	(a) In relation to a natural person:
	(i) A person recognized in law or religion as the spouse, life partner, or civil union partner;
	(ii) A child, including stepchild, adopted child, and child born out of wedlock;
	(iii) A parent or stepparent;
	(iv) A person legally responsible for managing affairs or daily care needs;
	(v) A spouse, life partner, or civil union partner of a person described in (ii) to (iv);
	(vi) A person in a commercial partnership with the individual.
	(b) In relation to a juristic person:
	(i) A subsidiary, holding company, or other related company of a company as provided in the Companies Act;
	(ii) A member of a close corporation;
	(iii) Another juristic person that would be a subsidiary or holding company had the first entity been a company;

	(iv) A person whose instructions the board of directors of the juristic person is accustomed to act upon;
	(c) In relation to any person:
	(i) Any juristic person whose board of directors is accustomed to act according to the directions or instructions of the first-mentioned person;
	(ii) A trust controlled or administered by that person.
Company	Has the meaning as provided in the Companies Act, 2008 (Act No. 71 of 2008).
Conflict of Interest	Any situation in which a provider or representative has an actual or potential interest that may:
	(a) Influence the objective performance of obligations to a client;
	(b) Prevent rendering unbiased and fair financial services to a client, or acting in the client's interest, including:
	(i) A financial interest;
	(ii) An ownership interest;
	(iii) Any relationship with a third party.
Distribution Channel	(a) Any arrangement between a product supplier and a provider or their associates, providing support or service to the provider for rendering financial services;
	(b) Any arrangement between providers or their associates, facilitating or enhancing their relationship with a product supplier;
	(c) Any arrangement between product suppliers or their associates, facilitating or enhancing their relationship with a provider.
Fair Value	As provided in the financial reporting standards adopted under the Companies Act, 1973.
Financial Interest	Any cash, voucher, gift, service, advantage, benefit, discount, travel, hospitality, accommodation, sponsorship, or other incentive, excluding:
	(a) Ownership interest;
	(b) Training not exclusively available to a selected group, excluding travel/accommodation;
	(c) A qualifying enterprise development contribution to a qualifying beneficiary entity by a provider that is a measured entity.
FSC	The Financial Sector Code as provided under the Broad Based Black Economic Empowerment Act, as amended.
Holding Company	As provided in the Companies Act, 2008 (Act No. 71 of 2008).
Immaterial Financial Interest	Any financial interest of determinable value not exceeding R1000 in any calendar year from the same third party:
	(a) Received by a sole proprietor provider or representative for their direct benefit;
	(b) Aggregated by a provider for its benefit or its representatives;

Measured Entity	As provided in the FSC, specifically relating to a qualifying enterprise development contribution.
Ownership Interest	(a) Any equity or proprietary interest, other than equity held as an approved nominee;
	(b) Includes dividends, profit share, or similar benefits derived from that interest.
Provider	An authorized financial services provider, including a representative.
Qualifying Beneficiary Entity	As provided in the FSC, related to a qualifying enterprise development contribution.
Qualifying Enterprise Development Contribution	As provided in the FSC.
Sign-on Bonus	(a) Any financial interest received as an incentive to become a provider;
	(b) Includes compensation for potential or actual loss of income or costs associated with establishing the provider's business.
Subsidiary	A subsidiary as provided in Section 1(3) of the Companies Act, 1973 (Act No. 61 of 1973).
Third Party	(a) A product supplier;
	(b) Another provider;
	(c) An associate of a product supplier or provider;
	(d) A distribution channel;
	(e) Any person providing financial interest to a provider or its representatives.

Legislative framework of the Policy

The legislative framework governing conflict of interest management for Financial Services Providers (FSPs) is outlined in the Financial Advisory and Intermediary Services Act (FAIS Act), 37 of 2002, and the General Code of Conduct for Authorized Financial Services Providers and Representatives, 2003. The purpose of these regulations is to ensure that FSPs and their representatives act with integrity, transparency, and in the best interests of their clients. This framework sets out the specific duties and obligations of providers in relation to managing conflicts of interest, including disclosure, avoidance, and mitigation measures. It also defines the types of financial interests that may be received or offered, ensuring that these interests do not compromise the fair treatment of clients or create material conflicts. Compliance with these provisions is crucial for maintaining trust and upholding the professionalism of the financial services industry.

The General Code of Conduct		**Key Requirement**
Section 3 - Specific Duties of the Provider		
(1)(b)		Providers and representatives must avoid or, where not possible, mitigate any conflict of interest between the provider and client, or representative and client.
(1)(c)		Providers or representatives must disclose conflicts of interest to clients in writing, including measures taken to avoid or mitigate conflicts, any ownership or financial interests, and the nature of third-party relationships causing conflicts.
(1)(f)		Providers must not engage in financial product transactions for their benefit based on advance knowledge or non-public information that could affect prices.
(5)		Providers cannot describe themselves as "independent" if they have significant ownership relationships or receive financial interests from product suppliers.
Section 3A - Financial Interest and Conflict of Interest Management		
(1)(a)		Providers or their representatives may only receive specific financial interests such as authorized commission or fees, and immaterial financial interests.
(1)(b)		Providers may not offer financial interests to representatives based on the quantity of business secured without considering fair outcomes for clients.
(1)(bA)		Providers must demonstrate that financial interests are linked to client service standards, fair outcomes, and compliance.

(1)(c)		Financial interests and conflicts do not apply if the same legal entity is both a product supplier and a provider.
(1)(d)		Financial interests must be reasonable and commensurate with the service provided, and not impede fair outcomes for clients.
(1A)		Category I providers authorized to give advice cannot receive a sign-on bonus, and no one may offer such bonuses as an incentive.
(2)		Providers must adopt and maintain a conflict of interest management policy that complies with the FAIS Act, including mechanisms for identification, avoidance, mitigation, disclosure, and compliance.
(2)(b)		The conflict of interest management policy must specify financial interest types for representatives and include details on associates, third-party ownership interests, and relationships causing conflicts.
(2)(c)		The policy must be adopted by the provider's governing body and communicated to employees, representatives, and associates.
(2)(d)		Providers must ensure employees and representatives are aware of the policy and receive relevant training.
(2)(e)		Continuous monitoring and annual review of the conflict of interest management policy is required.
(2)(f)		The policy must be publicly accessible, ensuring transparency for clients.
(3)		Providers or representatives cannot avoid compliance by using an associate or circumventing the policy through any arrangement involving an associate.
(4)		A compliance officer or provider must report on the implementation, monitoring, and accessibility of the conflict of interest management policy in compliance reports to the Registrar.

The FSP’s Board

The FSP's board is comprised of all the directors of the company, each bringing their expertise and oversight to ensure the organization operates in alignment with its objectives, legal requirements, and ethical standards. The board is responsible for guiding the strategic direction, reviewing key decisions, and ensuring that the company remains accountable to its clients and stakeholders. Through regular meetings and evaluations, the board plays a critical role in maintaining the integrity and success of the FSP. *The board is responsible for overseeing and ensuring effective management of conflicts of interest within the FSP, ensuring transparency and compliance with all relevant policies.*

Identification of Conflict of Interest

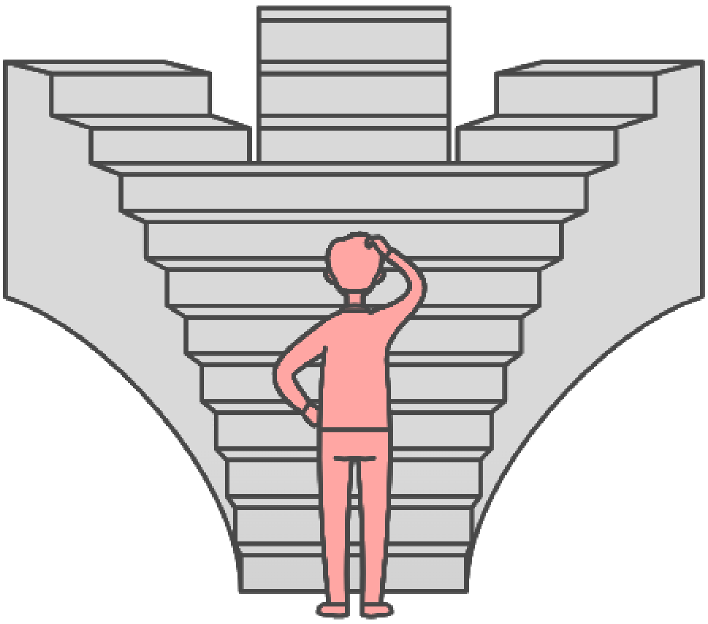
The responsibility for identifying potential conflicts of interest primarily lies with the representatives, employees, and individual members of the FSP’s Board (the board of directors)

During the process of providing financial services to a client, a representative must consider the following key questions:

1. Am I in a situation that could influence my ability to objectively fulfill my responisbilities to my client?

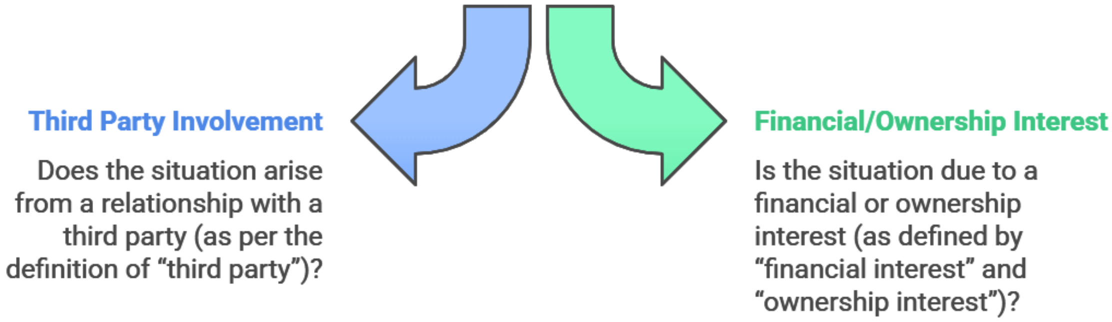
2. Am I in a situation that would prevent me from delivering unbiased and fair advice or intermediary services to my client?

3. Am I facing a situation where I cannot act in the best interests of my client?



If the response to all these questions is “no,” then there is no conflict of interest, and the representative may continue with the service.

However, if the answer to any of these questions is “yes,” the representative must further assess the situation by answering the following:



If the answer to any of these additional questions is "yes," this indicates the presence of a potential or actual conflict of interest that must be addressed.

Internal Measures for Identifying Conflicts of Interest

The FSP has implemented the following procedures to detect actual or potential conflicts of interest:

- The FSP's board conducts yearly assessments of all contracts with external parties to determine whether these agreements have any impact on the FSP's ability to perform impartially for its clients.
- The FSP's board carries out annual evaluations of all third-party contracts to examine whether these relationships influence the FSP's capacity to provide fair and unbiased financial services.
- The FSP's board performs yearly reviews of all external contracts to verify that these relationships do not interfere with the FSP's responsibility to act in the clients' best interests.
- The FSP's board conducts annual reviews of all relationships involving ownership stakes between the FSP and external entities to assess any influence these relationships might have on the FSP's objective performance for its clients.
- The FSP's board conducts annual evaluations of all relationships involving ownership interests between the FSP and external parties to assess if these relationships affect the FSP's ability to deliver unbiased and equitable financial services.

- All relevant employees are required to submit Conflict of Interest declarations on an annual basis. These declarations assist the FSP and the appointed Compliance Officer in identifying any actual or potential conflicts of interest.
- An updated list of the FSP's associates is included as an annexure and is reviewed annually.
- An updated list of all external entities in which the FSP holds ownership is included as an annexure and is reviewed annually.
- An updated list of all external entities holding ownership in the FSP is included as an annexure and is reviewed annually.
- The FSP maintains a Gift Register that records any gifts received from external parties valued at R500 or more. The Gift Register is kept as part of the FSP’s Compliance Manual.
- All relevant personnel (Key Individuals and Representatives) must immediately notify the FSP’s governing body and the Compliance Officer in writing of any actual or potential conflicts of interest upon becoming aware of them.

Step-by-Step Approach: Avoidance and Mitigation of Conflicts of Interest

Step 1: Identify the Conflict of Interest

✓ Detect an actual or potential conflict of interest within the Financial Services Provider (FSP).

Step 2: Convene the FSP’s Board

✓ The FSP’s Board meets to assess the situation transparently and objectively.

Step 3: Disclose Relevant Information

✓ Disclose all relevant information leading to or resulting in the conflict to the FSP’s Board and the FSP’s compliance officer.

Step 4: Deliberate on the Conflict

✓ The FSP's Board deliberates and determines, through a majority vote, whether the conflict can be avoided.

Step 5: Evaluate the Conflict

✓ The FSP's Board evaluates the conflict by considering:

- **Potential Negative Impact on Clients:** How the conflict, if unavoidable, will negatively impact clients.
- **Damage to the Integrity of the Financial Services Industry:** The potential damage to the industry if the conflict is deemed unavoidable.

Step 6: Determine if the Conflict Can Be Avoided

✓ **If the Conflict Can Be Avoided:**

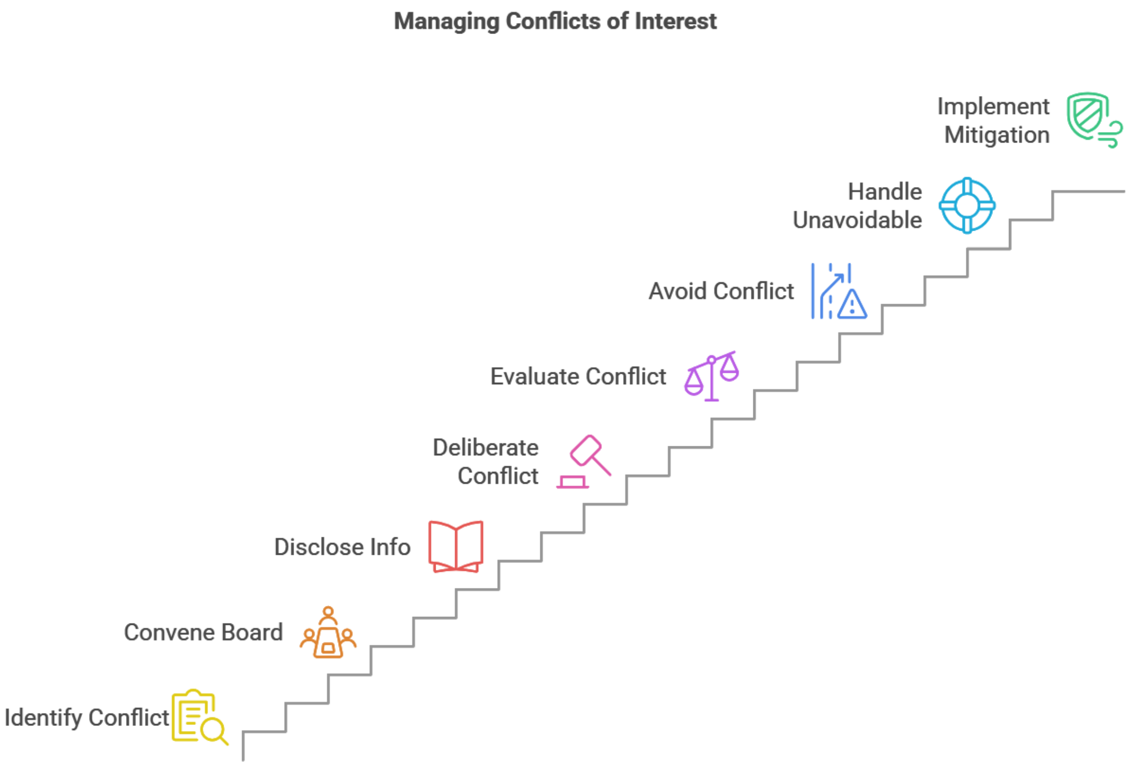
- **Step 6.1:** Remove the root cause or situation leading to the conflict as soon as reasonably possible.
- **Step 6.2:** Minimize any negative impact on clients during the resolution process.
- **Step 6.3:** Document the rationale for the decision to avoid the conflict in the FSP's Compliance Manual.
- **Step 6.4:** Actively avoid similar situations in the future that could lead to conflicts.

Step 7: Handle Unavoidable Conflicts

- **If the Conflict Is Unavoidable:**
  - **Step 7.1:** The FSP's Board and the compliance officer meet to determine reasonable steps to mitigate the conflict.
  - **Step 7.2:** Document the reasons for considering the conflict unavoidable in the FSP's Compliance Manual.

Step 8: Implement Mitigation Measures

- **Step 8.1:** Continuously reassess the conflict to determine if it can eventually be avoided.
- **Step 8.2:** If a previously deemed unavoidable conflict becomes avoidable, promptly address it.
- **Step 8.3:** Inform all relevant representatives about the conflict and the reasons for its unavoidability.
- **Step 8.4:** Require representatives to disclose the existence of the conflict to clients in writing when providing financial services.
- **Step 8.5:** The FSP or compliance officer must report on the status of the conflict in the FSP's compliance report submitted to the Financial Sector Conduct Authority.



Accepting and Providing Gifts

The Financial Services Provider (FSP) maintains a strict stance regarding the acceptance and offering of gifts and inducements to uphold transparency and safeguard the integrity of its operations. To ensure impartiality and avoid any potential conflicts of interest, employees, representatives, and key individuals are prohibited from accepting gifts, Favors, or inducements from third parties that could influence or appear to influence their professional judgment or decision-making.

The Financial Services Provider (FSP) undertakes to adhere strictly to its Conflict-of-Interest Policy, ensuring that all employees, representatives, and key individuals comply with the following commitments:

1. **Non-Acceptance of Gifts Beyond Permissible Limit**
   The FSP commits that no employee, representative, or key individual will accept any gift from a third parties that exceeds a total value of R1,000 **within any calendar year,** unless reviewed and approved by the FSP's Board in accordance with the policy guidelines.

2. **Reporting of Gifts Exceeding the Threshold**
   In the event that a gift is offered that exceeds the permissible threshold, the recipient will report the gift to the FSP's Board for a thorough review, ensuring that the acceptance aligns with the FSP's ethical standards and does not compromise impartiality.

3. **No Offering of Gifts or Inducements to Influence Business Decisions**
   The FSP undertakes not to offer any gifts, rewards, or inducements to third parties as a means to secure business or to influence any advice provided. This applies to both monetary and non-monetary incentives that could create a conflict of interest or undermine professional judgment.

4. **Documentation and Compliance**

   The FSP commits to maintaining comprehensive and accurate records of all gifts given or received, including those within the permissible limit. These records will be documented in the appropriate registers (Annexure C and D) to ensure full compliance with internal policies and relevant regulatory requirements.

Financial Interests and Conflict Management

Permissible Financial Interests

Providers and representatives are permitted to receive the following financial interests, in compliance with regulatory guidelines and to ensure transparency and fairness:

- **Authorised Commissions or Fees:** These must be for services rendered, and the amounts must fall within the prescribed regulatory limits set by relevant authorities. Commissions or fees should align with the nature and scope of the services provided.

- **Immaterial Financial Interests:** These refer to small, non-substantial financial benefits that are unlikely to influence the advice given or affect client outcomes. Examples may include minor incentives such as low-value gifts that do not create a conflict of interest.

Guidelines for Financial Interests

Providers must ensure that all financial interests are:

- ✓ **Reasonable and Proportional:** The financial interest received must be reasonable and directly commensurate with the value and scope of the services provided to the client. This ensures that financial incentives do not outweigh the duty of care, and the quality of service delivered.
- ✓ **Not Based on Business Volume:** Financial interests should not be influenced by the volume of business secured, nor should they incentivize representatives to prioritize securing high volumes of business that surpass fair and favourable outcomes for clients. The primary focus must always be on the client's best interest and the provision of services that align with their needs and objectives.

THE FSP COMMITS THAT:

- ✓ **Permissible Financial Interests:** Only authorised commissions, fees for services rendered, and immaterial financial interests that are unlikely to influence client outcomes will be accepted.
- ✓ **Reasonable and Proportional Interests:** All financial interests will be reasonable and proportionate to the services provided, ensuring that they align with the value of the service and are not based on business volume or outcomes that may compromise client interests.
- ✓ **Client-Centric Approach:** The FSP will ensure that financial interests do not prioritise business volume or create conflicts of interest, always maintaining a focus on fair outcomes for the client.

Prohibition of Sign-On Bonuses for Category I Providers

In line with regulatory requirements, Category I providers authorised to give advice are strictly prohibited from receiving sign-on bonuses. Furthermore, no individual, including management and key individuals, may offer sign-on bonuses as an incentive to join as a Category I provider. This policy ensures that the decision to become a Category I provider is based on professional qualifications and integrity, free from any undue influence or potential conflicts of interest.

Any breach of this policy will result in an immediate investigation, followed by appropriate action in accordance with the FSP's compliance procedures.

Disclosure of Conflicts of Interest

The FSP acknowledges that while disclosure alone may not always resolve conflicts of interest, it is a crucial component in their management. The FSP is dedicated to ensuring that clients are fully informed about any actual or potential conflicts of interest that may arise in the provision of financial services.

The FSP has implemented the following disclosure practices:

1) **Disclosure of Conflicts:** The FSP will disclose any conflicts of interest that may affect a client in a clear and transparent manner.

2) **Timely Disclosure:** Disclosure will be made in writing as soon as reasonably possible, and may be communicated through appropriate electronic channels where necessary.

3) **Details of the Conflict:** The disclosure will include comprehensive information about any relationships or arrangements with third parties that give rise to the conflict of interest.

4) **Clarity on the Nature of the Conflict:** The disclosure will provide sufficient detail for the client to fully understand the specific nature of the relationship or arrangement that creates the conflict of interest.

5) **Steps to Address the Conflict:** The disclosure will outline the steps taken by the FSP to either avoid or mitigate the conflict of interest.

6) **Ownership and Financial Interests:** The disclosure will include any ownership or financial interest, excluding immaterial financial interests, that the FSP or its representatives currently hold or may be entitled to in the future.

7) **Access to Policy:** The disclosure will reference the FSP's Conflict of Interest Management Policy and provide clear instructions on how the client can access the full policy through the FSP's website.

Through these practices, the FSP ensures that clients are kept fully informed, promoting transparency and upholding the highest ethical standards in managing conflicts of interest.

Training and Awareness

To ensure the effective implementation of the Conflict-of-Interest Management Policy, the FSP is committed to providing ongoing training and awareness programmes for all employees and representatives. These programmes will focus on identifying potential conflicts of interest, understanding disclosure procedures, and emphasising the importance of ethical conduct in business dealings.

Training will be provided during onboarding and regularly thereafter, ensuring staff remain updated on any changes to policies or regulatory requirements. The FSP will also reinforce the responsibility of each employee and representative to identify, report, and manage conflicts of interest in a way that upholds the organisation's commitment to transparency, fairness, and client trust.

By fostering a culture of awareness and accountability, the FSP ensures its team is well-equipped to manage potential conflicts of interest and act in the best interests of clients and stakeholders.

Consequences of Non-Compliance

If it is determined that an employee or representative has not disclosed an actual or potential conflict of interest through the proper channels, the FSP will initiate an investigation and take necessary actions to prevent any financial harm to the FSP, its clients, or any third parties involved.

Should the investigation reveal that an employee or representative failed to disclose a conflict of interest, the FSP will take immediate disciplinary action, including corrective measures, in line with company policies. Any violation of the Conflict-of-Interest Management Policy will be treated as a serious misconduct, and such failure may result in termination of employment.

Reporting to the Regulator in Terms of Compliance Reports

In line with the company's compliance framework and as required by the FAIS Act, the Compliance Officer is obligated to submit regular compliance reports directly to the Registrar. These reports are vital to ensuring that the company complies with all relevant regulatory requirements, while also identifying, managing, and disclosing any conflicts of interest. This process helps maintain regulatory alignment and upholds the company's commitment to transparency and ethical business practices.

Conclusion

In conclusion, the FSP is fully committed to maintaining the highest standards of integrity and transparency in all its operations. Through the implementation of comprehensive procedures for identifying, avoiding, and mitigating conflicts of interest, as well as clear disclosure and compliance practices, the FSP ensures that the interests of its clients are always prioritised. The FSP's Board, along with its employees and representatives, plays a vital role in upholding these standards.

Any failure to comply with these policies will be addressed with appropriate actions to maintain the trust and confidence of both clients and stakeholders.

Associates Register

Annexure A

(In accordance with Section 3A (2)(b)(iii) of the General Code of Conduct)

Name of Associate	Relationship to the FSP	Nature of Associate Relationship to the FSP	Comments

Ownership Interests Held by the FSP Register

ANNEXURE B

In accordance with Section 3A (2)(b)(v) of the General Code of Conduct

Date	Entity Name	Nature of Ownership (Shares, Equity, etc.)	Percentage Held	Nature of Business	Comments
YYYY-MM-DD	[Company Name]	Shares/Directorship	[Percentage]	Financial Services/Other	[Details]

Ownership Held in the FSP

Annexure C

In accordance with Section 3A (2)(b)(vii) of the General Code of Conduct

Date	Name of Shareholder/Entity	Type of Ownership	Percentage Owned	Nature of Relationship
Example - YYYY-MM-DD	John Doe	Shares	15%	Shareholder

Gift Register (Gifts Given by the FSP to a Third Party)

Annexure D

Date	Recipient Name	Recipient Entity	Nature of Gift	Value (R)	Reason for Gift	Approval Given By

Gift Register (Gifts Received by the FSP from a Third Party)

Annexure E

Date	Recipient Name	Received from	Nature of Gift	Value/Estimated Value (R)	Purpose of Gift	Approval Given By (Management)

Annual Conflict of Interest Declaration Form

Annexure F

(To be completed by all employees, directors, and representatives of the FSP each year)

1. Employee Information

- **Full Name:** ______________________________
- **Job Title:** ______________________________
- **Department:** ______________________________
- **Date:** _________________

2. Conflict of Interest Declaration

2.1. Personal or Business Interests

Do you or any close family members (spouse, partner, children, relatives) have a financial or business interest in any company that does business with or competes with the FSP?

☐ **No**

☐ **Yes** (If yes, please provide details below)

Company Name	**Your Relationship (e.g., Owner, Director, Investor, etc.)**	**Potential Conflict? (Yes/No)**	**Additional Details/Comments**
[Company Name]	[e.g., Shareholder, Director]	Yes/No	

2.2. Outside Work or Business Activities

Do you have any other jobs, side businesses, or professional roles outside of your position at the FSP?

☐ **No**

☐ **Yes** (If yes, provide details below)

Company/Organisation Name	**Role/Position**	**Potential Conflict? (Yes/No)**	**Additional Details/Comments**

[Company Name]	[e.g., Consultant, Director]	Yes/No	

2.3. Gifts and Hospitality

Have you received or given any gifts, travel, entertainment, or other benefits from/to a client, supplier, or third party in the past year, that exceed the FSP's allowed threshold of R1000 per year?

☐ **No**

☐ **Yes** (If yes, provide details below)

Date	**Received From/Given To**	**Type of Gift (e.g., Voucher, Dinner, Travel)**	**Estimated Value (R)**
YYYY-MM-DD	[Supplier/Client Name]	[e.g., Dinner, Hotel Stay]	R [Amount]

2.4. Family or Close Relationships in Business

Do you have a close family member or associate working for a company that provides services or products to the FSP?

☐ **No**

☐ **Yes** (If yes, provide details below)

Name of Family Member/Associate	**Relationship**	**Company Name**	**Potential Conflict? (Yes/No)**
[Name]	[Spouse, Sibling, etc.]	[Company Name]	Yes/No

2.5. Other Potential Conflicts

Are there any other actual or potential conflicts of interest that you believe should be disclosed?

☐ **No**

☐ **Yes** (If yes, provide details below and a separate annexure detailing more information regarding the potential/actual conflict of interest)

Description of Conflict	**Who is Involved?**	**Potential Impact?**

[Brief Description]	[Names/Entities]	[How it may affect business]

Note: Please refer to the Conflict-of-Interest Policy to determine whether a situation constitutes a conflict.

3. Declaration

I confirm that:

✓ I have disclosed all relevant conflicts of interest.

✓ I understand that I must update this form if my circumstances change.

✓ I have read and understood the FSP's Conflict of Interest Policy.

✓ I acknowledge that failure to disclose a conflict of interest may lead to disciplinary action.

Employee/Director/Representative Signature: ____________________________

Date:_________________