

## **CONFLICT OF INTEREST MANAGEMENT POLICY for Claassens Makelaars CC**

At Claassens Makelaars CC, we are committed to comply with all regulatory requirements governing conflict of interest as per the FAIS General Code of Conduct. We want to ensure that any conflict of interest is managed appropriately to the benefit of our clients and other parties dealing with us.

### **1. Identification**

Prior to concluding new business arrangements, Claassens Makelaars CC and its representatives shall consider whether the proposed arrangement will present any potential of conflict of interest. Claassens Makelaars CC and its representatives will continuously monitor dealings with clients and other parties to identify conflict of interest.

### **2. Control**

Where conflict of interest has been identified, all steps will be taken to avoid it. If avoidance is not possible, then we will consult with our Compliance Officer to either mitigate or manage the conflict of interest. Measures to mitigate or manage such conflict of interest will be documented and communicated to all involved, to ensure appropriate management of the risk.

### **3. Monitoring & Compliance**

Key Persons are responsible to oversee the management of any conflict of interest that was identified. Our compliance officer, Masthead (Pty) Ltd, monitors compliance with the Conflict of Interest Policy and ensure that appropriate registers, training, procedures, and processes are up to date.

### **4. Training**

Training is provided for all staff to ensure that they understand the responsibilities under the Conflict of Interest policy.

## 5. Financial Interests Received

Claassens Makelaars CC only receives monetary remuneration from insurers or third parties, as follows:

- a) Commission authorised under the Long-term Insurance Act, 1998 (Act No. 52 of 1998) or the Short-term Insurance Act, 1998 (Act No. 53 of 1998).
- b) Fees authorised under the Long-term Act, 1998 (Act No. 52 of 1998), the Short-term Act, 1998 (Act No. 53 of 1998), if those fees are reasonably commensurate to a service being rendered;
- c) Any additional fees for rendering of financial services, if those fees
  - i) are specifically agreed to by a client in writing; and
  - ii) may be stopped at the discretion of that client;
- d) Other fees or remuneration for the rendering of a service to a third party, which are reasonably commensurate to the service being rendered;
- e) Other immaterial financial interest subject to any law.

## 6. Financial Interests Offered

Claassens Makelaars CC may offer additional remuneration or incentives to its representatives, staff or third parties, in respect of:

- a) Introduction of new business.
- b) Servicing of existing business.
- c) additional services relating to its business or clients.

Subject to legislation and regulatory requirements.

## 7. Products or Supplier Preference

Claassens Makelaars CC or any of its representatives may not or will not give preference to:

- a) The quantity of business secured for a service provider to the exclusion of the quality of the service rendered to client; or
- b) A specific supplier, where a representative may recommend more than one supplier to a client; or
- c) A specific product; where a representative may recommend similar products to a client.

## 8. Gifts

All received gifts are monitored and noted in a gift register. The gift register form part our compliance monitoring and a copy of the gift register is available on request.

## 9. Declarations

- a) Representatives will not and may not accept any monetary incentive from any service provider or third party.
- b) No provider or third party holds any shares in Claassens Makelaars CC.
- c) Claassens Makelaars holds no shares or financial interest in any insurer or service provider.
- d) More than 30% of total commission is received from Santam Ltd.
- e) The contents of this Financial Interest and Conflict of Interest Management Policy forms part of the communication to our clients.

## 10. Remuneration

Claassens Makelaars CC only receives commission and fees in respect of business placed with the following entities and affiliates:

- a) Alexander Forbes
- b) Commercial and Industrial Acceptances
- c) First Property Acceptances
- d) Hollard
- e) Liberty
- f) Old Mutual Insure
- g) Santam Ltd

## 11. Consequence of non-compliance

Failure to comply with the provisions of this policy by any staff member or representative of Claassens Makelaars CC shall constitute serious misconduct and will result in disciplinary action.