



CONFLICT OF INTEREST MANAGEMENT POLICY

FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT

OAKHAVEN CAPITAL (PTY) LTD

FSP 43738

1. INTRODUCTION

- 1.1. This document embodies the Conflict of Interest Management Policy for Oakhaven Capital (Pty) Ltd (“the FSP”) who is an authorised financial services provider in terms of the Financial Advisory and Intermediary Services Act (FAIS) and is regulated by the Financial Sector Conduct Authority (FSCA).
- 1.2. The FSP is committed to ensuring that all business is conducted in accordance with good business practice and industry standards.
- 1.3. The FSP strives to render financial services in an ethical and equitable manner and in a way that safeguards the interests of all stakeholders to mitigate and manage all real or potential conflicts of interest (“COI”).
- 1.4. The FSP has also implemented a Personal Account Trading Policy and this policy should be read together with this Conflict of Interest Management Policy.
- 1.5. The FSP and its representatives must therefore avoid (or mitigate where avoidance is not possible) any COI between the FSP, its representatives and clients.

2. DEFINITIONS

- 2.1. “**COI**” means any situation in which the FSP or its representatives has an actual or potential interest that may, when rendering a financial service to a client influence the objective performance of obligations to that client or prevent the FSP or its representatives from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client, including, but not limited to a financial interest, an ownership interest and any relationship with a third party.
- 2.2. “**Connected person**” means a spouse or partner, minor children, a person in a business or profit-sharing relationship with an employee of the FSP, including partners in an investment club, a trust in which the employee or any person is a beneficiary, a company in which the employee or any person mentioned herein is a shareholder, a pension fund (other than a pension fund managed by the institution) of which the employee or any person mentioned herein is a beneficiary and any other trading accounts where this person has either a direct or an indirect benefit.
- 2.3. “**Employee**” means any person who is mandated or employed by the FSP that includes persons dealing for or on behalf of the FSP and any person who is privy to confidential or proprietary information which could result in a conflict of interest if the employee used the information to his/her advantage, and a person on secondment or contract, and connected persons.
- 2.4. “**Financial interest**” means any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic and foreign travel, hospitality, accommodation, sponsorship, other incentive, or valuable consideration, other than an ownership interest, training, that is not exclusively available to a

selected group of providers or representatives on products and legal matters relating to those products, general financial and industry information, specialised technological systems necessary for the rendering of a financial service but excluding travel and accommodation associated with that training.

- 2.5. **“Third party”** means a product supplier, another provider, an associate of a product supplier or a provider, a distribution channel or any person who in terms of an agreement or arrangement with a person referred to herein.
- 2.6. **“Immaterial financial interest”** means any financial interest with a determinable monetary value, the aggregate of which does not exceed R1 000 (one thousand rand) in any calendar year from the same third party in that calendar year received by a provider who is a sole proprietor, or a representative for that representative’s direct benefit, or a provider, who for its benefit or that of some or all its representatives, aggregates the immaterial financial interest paid to its representatives.

3. OBJECTIVES

- 3.1. The objectives of this Policy include:
 - 3.1.1. To provide guidance on the behaviors expected in accordance with expected industry standards.
 - 3.1.2. To promote transparency and to avoid or mitigate business related conflict of interest.
 - 3.1.3. To ensure fairness in the interests of employees of the FSP.
 - 3.1.4. To document the process for the disclosure, approval and review of activities that may amount to actual, potential, or perceived conflict of interest.
 - 3.1.5. To provide a mechanism for the objective review of personal outside interests.

4. CONFLICT OF INTEREST MANAGEMENT

- 4.1. In accordance with an employee’s obligation to act in the best interest of an employer, it is not permissible for employees to engage in conduct that could amount to a COI.
- 4.2. The FSP will have potential COI scenarios that have to be avoided or mitigated:
 - 4.2.1. Personal account trading;
 - 4.2.2. Directorships or other managerial roles and employment relationships;
 - 4.2.3. Personal associations with:
 - 4.2.3.1. Certain groups or organisations;
 - 4.2.3.2. family relations; and

4.2.3.3. connected persons.

- 4.3. The FSP or its representatives may only receive or offer financial interest from or to a third party as determined by the Commissioner of the Financial Sector Conduct Authority.
- 4.4. The FSP may not offer any financial interest to its representatives for giving preference to the quantity of business secured for the provider to the exclusion of the quality of the service rendered to clients
- 4.5. The FSP may not offer any financial interest to its representatives for giving preference to the quantity of business secured for the provider to the exclusion of the quality of the service rendered to clients.
- 4.6. Employees are required to record all gifts received in the Gift Registry of the FSP attached hereto as Annexure A.

5. DISCLOSURE OF COI

5.1. An employee must at the earliest reasonable opportunity inform the FSP in writing and disclose any potential COI to senior management.

5.1.1. The written notification must contain the following information:

5.1.1.1. Measures taken to avoid or mitigate the conflict,

5.1.1.2. any ownership interest or financial interest that the FSP or a representative may be or become eligible for; and

5.1.1.3. in sufficient detail the nature of the relationship or arrangements with a third party that gives rise to a COI to enable the client to understand the exact nature of the COI.

5.2. An employee must at the earliest reasonable opportunity inform a client of this Conflict of Interest Management Policy and how it may be accessed.

6. NON-COMPLIANCE WITH THIS POLICY

6.1. Compliance with this policy forms part of the FSPs conditions of employment and is compulsory for all employees and senior management to adhere to the provisos herein.

6.2. Non-compliance will lead to disciplinary action being taken against employees who are non-compliant.

