



## **CONFLICT OF INTEREST MANAGEMENT POLICY**

### **1. Introduction**

In terms of the Financial Advisory and Intermediary Services Act, 2002, Rodel Administration Services Pty Ltd is required to maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps to identify, monitor and manage conflicts of interest. Rodel Administration Services Pty Ltd has put in place a policy to safeguard its client's interests and ensure fair treatment of clients. The key information is summarised below. Detailed information can be obtained on request from the Key Individual who is responsible to monitor and manage conflicts of interest on behalf of the FSP.

### **2. Our objectives**

Rodel Administration Services Pty Ltd is an authorised financial services provider (FSP), providing advice and intermediary services to its clients. Like any FSP we are potentially exposed to conflicts of interest in relation to various activities.

Our primary objective in relation to the management of conflicts of interest is to avoid conflicts where possible. Where this is not possible, we will mitigate and manage any conflicts that may arise between ourselves or any Representatives and our clients.

The protection of our clients' interests is essential and so our policy sets out how:

- we will identify circumstances which may give rise to actual or potential conflicts of interest entailing a material risk of damage to our client's interests;
- we have established appropriate structures and systems to manage those conflicts; and
- we will maintain systems in an effort to prevent damage to our client's interests through identified conflicts.

### **3. Conflict of interest**

A conflict of interest is any situation where Rodel Administration Services Pty Ltd or any of our Representatives has an actual or potential interest that when rendering a financial service to a client, their ability to provide such service objectively is influenced or prevents them from rendering an unbiased and fair financial service to the client or from acting in the best interests of the client.

### **4. Identifying and Managing Conflict of Interest**

We strive towards ensuring we are able to appropriately and effectively identify and manage potential conflicts. We may manage potential conflicts through avoidance,



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establishing confidentiality barriers or by providing appropriate disclosure of the conflict to affected clients.

In determining whether there is or may be a conflict of interest we consider whether there is a material risk of damage to the client, taking into account whether any of our employees, Representatives, Key Individuals or shareholders:

- is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- has any ownership interest in another FSP, product supplier or other third party that would affect our Representatives' ability to render a fair and unbiased service to clients;
- has an interest in the outcome of a service provider to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- has a financial or other incentive to favour the interests of another client or group of clients over the interests of the client;
- receives or will receive from a person other than the client, an inducement in relation to a service provided to the client in the form of monies, goods or services, other than the standard commission or fee for that service.
- Any other relationship with another FSP, product supplier or third party that affects us or any of our Representatives' ability to render a fair and unbiased services in the interests of clients.

#### **5. Confidentiality barriers**

Our employees respect the confidentiality of client information and disclose or use it with circumspect. No such information will be disclosed to a third party without the prior written consent of a client.

No confidential client information may be used by us or our employees for their own personal financial gain.

#### **6. Financial Interest**

Financial interest includes any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration.

Where we charge clients fees for our services or services to a third party we have ensured that:



- they are services not covered by commission;
- the fees are commensurate to the services provided;
- we disclose the amount, frequency, payment method and recipient of the fees as well as the services to be provided;
- the fees are agreed to by clients in writing;
- the fees can be stopped by the client at their discretion.

Our employees will not accept any financial interest other than those considered normal in their line of business. Excessive financial interest from clients may result in a conflict of interest, which we are committed to avoiding.

Remuneration from third parties in relation to a service provided to clients is acceptable only if they are appropriately disclosed to clients and if it is either the payment of a normal fee or commission to continue the quality of our services to clients and does not impair our duty to act in the best interests of clients.

Our employees may accept other financial interest from third parties including other financial services providers and product suppliers where the aggregated value of the financial interest received does not exceed R 1,000.00 in any calendar year from the same third party.

Rodel Administration Services Pty Ltd and our employees similarly ensure that we do not offer financial interest in excess of R 1,000.00 to any Representative of another financial services provider or product supplier in any calendar year.

We do not offer any financial interest to its Representatives for:

- the quantity of business secured without giving due regard to the delivery of fair outcomes for clients; or
- for giving preference to a specific product supplier, where the representative may recommend more than one product supplier to a client; or
- for 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.

Financial interest offered must meet the following criteria to be due by the Representatives:

- minimum service level standards must be met as per our employment contracts and remuneration policy,



- delivery of fair outcomes for clients must be met as per our TCF policy and employment contracts,
- quality of compliance with the FAIS Act and Regulations as determined by completion of our stipulated analysis, advice, recommendation and disclosure documents.

The following have been confirmed when determining financial interest payable to Representatives:

- they are reasonably commensurate to the service provided,
- the payment of the fees does not result in duplicate remuneration for performance of the service,
- the payment of the fees does not impede delivery of fair outcomes to clients.

## **7. Disclosure**

There are specific limitations for FSPs when referring to themselves:

- At no point will we refer to ourselves as an authorised FSP should this not be true nor refer to any licence categories for which we are not duly authorised. In addition we will not trade as an FSP or in the relevant categories should this be the case;
- We will never create the impression that any of our non-financial products are part of our FAIS licence or under the jurisdiction of the Authority;
- [Company Name] can refer to ourselves as independent when marketing and communicating with clients as:
  - No product provider owns shares in Rodel Administration Services Pty Ltd,
  - Rodel Administration Services Pty Ltd does not own shares in any product provider,
  - We do not receive remuneration from any product supplier other than commission, and
  - We have no other relationship with any product supplier.

Where a conflict of interest affecting a client has been identified, we will ensure that the Key Individual or representative following consultation with the Key Individual, at the earliest opportunity discloses to the affected client the existence of the conflict of interest.



The disclosure will where applicable include:

- The measures taken to avoid or manage the conflict;
- Details of any ownership or financial interest that the FSP or any representative of the FSP may become eligible for as a result of the situation giving rise to the conflict;
- The nature of the arrangement or relationship with the third parties that has caused the conflict;
- The fact that this Conflict of Interest Policy exists and is available to the client on request.

The above disclosures will be made in writing in sufficient detail that will allow the affected client to make an informed decision on whether to continue using our services in the situation concerned.

#### **8. Declining to act**

We may decline to act for a client in cases where we believe the conflict of interest cannot be managed in any other way.

Our policy defines possible conflicts of interest as:

- Conflicts of interest between ourselves and clients;
- Conflicts of interest between our clients if we are acting for different clients and the different interests conflict materially;
- Holding confidential information on clients which, if we would disclose or use, would affect the advice or services provided to clients.

#### **9. Monitoring**

The Key Individual in charge of supervision and monitoring of this policy will regularly provide feedback on all related matters.

An immaterial financial interest register is maintained as an additional mechanism to monitor potential and actual conflicts of interest.

#### **10. Procedures**

Whenever we or one of our Representatives renders a financial service, we will disclose the existence of any financial interest in the relevant services or any other circumstances which gives rise to an actual or potential conflict of interest in relation to such service and take all responsible steps to ensure fair treatment of the client. This is usually contained in our disclosure document, but any particular cases will be disclosed directly to the client in writing.



Any potential or actual conflict of interest will be reported by the Representative to the Key Individual so that the appropriate action can be taken.

All Representatives are responsible for ensuring that any financial interest received or offered is recorded in the immaterial financial interest register which is available on the premises should a client wish to obtain further details. Representatives are responsible for ensuring that they do not exceed with prescribed limit as detailed under item 6 above.

#### **11. Training and Declaration**

Training on the Rodel conflict of Interest management policy will be conducted annually for all staff and during the induction period for new staff.

Staff will be required to complete the conflict-of-interest declaration form (an example of which is below in annexure a), annually in January or when they have been appointed as part of the staff induction process.

#### **12. Non-Compliance with this policy**

If any Representative is uncertain whether a particular situation gives rise to an actual or potential conflict of interest, the Representative must bring the matter to the Key Individual's attention.

Failure to comply with this policy and the FAIS regulatory requirements relevant to the management of conflicts of interest, will be subject to our disciplinary procedures. If found to have acted contrary to this policy and / or the regulatory requirements, the Representative may be debarred in terms of section 14 of the FAIS Act.



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Conflict of Interest Management Policy - Summary of other identified conflicts and corrective actions taken				
Possible other conflicts identified?	Do we see this as a potential conflict?		If Yes what have we done about it?	Controls in place?
Staff receiving gifts, vouchers and the like.	Yes		We have instituted specific controls to monitor these activities and have included full disclosure of the possibility of payments, gifts and the like as well as the limits applicable in our standard disclosure documentation supplied to clients	We have set up a register to monitor all gifts and hospitality received by the FSP to ensure that no provider supplies anything in excess of R 1000 in any one calendar year. This register can be viewed upon written request
Staff providing gifts, vouchers and the like to clients, third parties or associated companies.	Yes			
Staff entertained by Associate or Third party companies	Yes			We have set up a register to monitor all gifts and hospitality provided to the FSP to ensure that no representative of a provider receives anything in excess of R 1000 in any one calendar year from us. This register can be viewed upon written request
Staff entertaining Associate or Third-party companies	Yes			
Staff employment elsewhere?		No		
Others		No		
Others		No		



## **Annexure A**

### **Staff Conflict of Interest Questionnaire**

This questionnaire is an integral part of the companies Conflict of Interest management policy, a copy of which forms part of the documents supplied to you upon employment. The questionnaire is completed upon employment and at least annually but it is expected that any changes that occur in your personal circumstances are disclosed to us as they occur or you are aware of changes that are about to take place.

Whilst our full policy contains all the required definitions the following have relevance for this questionnaire;

#### Third party:

Any product supplier (insurer), any other Financial Services Provider, any distribution channel (a company that provides assistance with the sale of insurance products to the greater financial industry) and any other person or company that has a relationship with companies within the financial industry (other than Suppliers and Services providers defined below).

#### Service Providers:

The suppliers of services within the insurance business e.g. Panel beaters, assessors, contractors, security companies.

#### Supplier:

The suppliers of services or goods to the company outside the insurance business e.g. stationary, IT, accounting.

#### Other employment:

Any of the following relationships: Employer/Employee, Partnership, Owner, work for NGO's Section 21 companies or community associations.

#### Family:

Spouse (legal, religious, civil union, life partner), Child (own/adopted/step), Parent (own/step and their spouses), Siblings (own, step), immediate next level of any of the former (Niece, Nephew, Uncle, Aunt, Cousin) and Guardian/s.

#### Financial Interest:

- (i) products and legal matters relating to those products;
- (ii) general financial and industry information;
- (iii) specialised technological systems of a third party necessary for the rendering of a financial service;

but excluding travel and accommodation associated with that training;

#### **NB:**

All answers given as Yes need to provide full details.



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If there are any relationships that exist that you feel may not be covered by the above definitions or the questions, then please provide this information.

1. Do you or any member of your family have any direct financial interest in any third party?

	Yes	No
Details:		

2. Do you or any member of your family have any direct financial interest in any Service provider?

	Yes	No
Details:		

3. Do you or any member of your family have any direct financial interest in any Supplier?

	Yes	No
Details:		

4. Are you or any member of your family employed by any Third party?

	Yes	No
Details:		

5. Are you or any member of your family employed by any Service Provider?

	Yes	No
Details:		

6. Are you or any member of your family employed by any Supplier?

	Yes	No
Details:		

7. Do you have any other employment?

	Yes	No
Details:		

8. Are you or any member of your family a director of any Third Party?

	Yes	No
Details:		

9. Are you or any member of your family a director of any Service Provider?

	Yes	No
Details:		

10. Are you or any member of your family a director of any Supplier?

	Yes	No
Details:		



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11. Have you or any member of your family received any financial interest from any Third Party within the past 12 months?

	Yes	No
Details:		

12. Have you or any member of your family received any financial interest from any Service provider within the past 12 months?

	Yes	No
Details:		

13. Have you or any member of your family received any financial interest from any Supplier within the past 12 months?

	Yes	No
Details:		

14. Have you or any member of your family a current debtor - creditor relationship with any Third Party?

	Yes	No
Details:		

15. Have you or any member of your family a current debtor - creditor relationship with any Service provider?

	Yes	No
Details:		

16. Have you or any member of your family a current debtor - creditor relationship with any Supplier?

	Yes	No
Details:		

17. Do you have any relationship, including a financial one, with any member of management, any director/member, or other staff member of the company?

	Yes	No
Details:		

18. Any other information you deem relevant?

	Yes	No
Details:		

Declaration:

I have read and fully understand the Companies Conflict of Interest Management policy.

I confirm that the information supplied is accurate and complete.



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I undertake to advise the company of any changes to the provided detail or any other situation that may arise that could potentially be seen as a conflict of interest.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_