

Conflict of Interest Management Policy

SCA is committed to identifying any potential conflicts of interest timeously and this is the responsibility of the Key Individual Stephen Cloete.

SCA maintains and annually reviews a register of potential conflict risks taking into consideration all areas and income streams.

All employees of SCA are responsible for identifying and highlighting any instances of a conflict or potential conflict to the Key Individuals. The Key Individuals will assess the implications, determine the course of action and act impartially.

Process:

1. The Key Individual will assess each conflict in terms of:
 - Whether the conflict is actual, potential or perceived,
 - What the value of the conflict or exposure is
 - The potential reputational risk
2. Compliance and management will meet and decide on the controls that need to be put in place to manage the conflict

Disclosure:

Where there is no other way of avoiding or managing a conflict, or where the measures in place do not sufficiently protect a client interests, the conflict must be disclosed to allow clients to make an informed decision on whether to continue using the service in the situation concerned. In all cases, where appropriate and where determinable, the monetary value of non-cash inducements will be disclosed to clients.

Publication:

Publish the Conflict of Interest Management Policy in appropriate media. Ensure that it is easily accessible for public inspection at all reasonable times.

Declining to act:

The business may decline to act for a client in cases where it believes the conflict of interest cannot be managed in any other way.

Measurement for avoidance and mitigation of conflict of interests

- Create awareness and knowledge of applicable stipulations of the General Code of Conduct and relevant legislation relating to conflicts of interest, through training and educational material
- Ensure understanding and adoption of the conflict of interest management policy and management measures by all employees, representatives and associates
- Conduct regular inspections on all commissions, remuneration, fees and financial interests proposed or received in order to avoid non-compliance

Ongoing monitoring of conflict of interest management

- All representatives to make a declaration for compliance done quarterly and reported to compliance officer
- All employees to sign a statement to the effect that they have read the policy and fully understand the provisions and requirements thereof and this forms part of each employee's employment contract.
- Policy to be reviewed annually
- Include the policy the annual compliance report to FSCA
- Ensure that it contains the details "...on at least the implementation, monitoring and compliance with, and the accessibility of the Conflict of Interest Management Policy."
- All new employees, representatives and associates to receive full and comprehensive training on the Conflict of Interest Policy
- Ad hoc checks to be performed by the Key Individuals to ensure the policy has been complied with and non-compliance to be reported.