

## Warwick Advisory (Pty) Ltd (FSP No 48740)

### Conflicts of Interest Management Policy – Abridged Version

#### 1. Introduction

This document details the Conflicts of Interest Management Policy for Warwick Advisory (Pty) Ltd, hereinafter referred to as “Warwick”.

A short summary of this policy is included in the Warwick “Letter of Introduction” document, issued and explained to clients at the beginning of the sales process. The full Conflicts of Interest Management Policy document is also available on request.

This policy applies to all employees of Warwick.

#### 2. What is a Conflict of Interest and when may it arise?

A conflict of interest may arise where Warwick, or one of its employees, is providing a financial service to its clients that may entail a material risk of damage to those clients’ interests and where the company or its employee:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- Has an interest in the outcome of a service provided 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 interest of another client, or group of clients, over the interests of the client;
- Carries on the same business as the client; or
- 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 disclosed for that service.

#### 3. How we manage conflicts of interest

The following are examples of conflicts of interest and how we manage these conflicts:

##### i. Contracts, proposed contracts and similar transactions or arrangements

A conflict of interest may arise where an employee has a direct or indirect interest in a transaction. This may be where the employee, or the employee’s family, has a connection to the other party to the

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transaction. The connection could arise from, amongst other things, a directorship, significant shareholding, employment or consultancy.

Warwick requires disclosure of any connection which could, or could be seen to, have the effect of compromising the judgment of any of our employees. Employees are required to notify the Head of Compliance of any such potential conflicts of interest, who will then decide if the employee can be involved in the transaction. The Head of Compliance will also ensure that the relevant provisions have been met.

## ii. Gifts, Hospitality & Inducements

Inducements, gifts and hospitality are all issues that could lead to potential Conflict of Interest. Warwick has a strict policy regarding such issues, which is documented in the Company's Code of Conduct. All Employees must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest.

Employees must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise Warwick's integrity. Any such gifts are to be immediately reported to the Head of Compliance. A register is kept of any gifts, or hospitality received.

Employees cannot attend hospitality events, without the approval of the Head of Compliance. Where an invitation could be construed as being a business inducement, it must be declined.

## 4. Warwick's policy

Warwick expects all its employees to maintain the highest standards in carrying out their business activities, adhering to legislative requirements and our policies on business conduct. Warwick expects its employees to act professionally, honestly and ethically in all their dealings with clients, colleagues and third parties. The company has a clear policy on Conflicts of Interest and does not tolerate contravention hereof:

- Conflicts of Interest should always be avoided, wherever possible.
- If it is not possible to avoid a conflict or potential conflict, such conflict must be disclosed.

Should you require the full unabridged version of this document, please email [clientcare@thewarwickgroup.com](mailto:clientcare@thewarwickgroup.com) or complete a request form, which can be found at [www.warwickwealth.com](http://www.warwickwealth.com).

Your request will be responded to within two working days.

**Director**



**Rudi Kotze**