Conflict of Interest Management Policy

Silverhurst Wealth Partners (Pty) Ltd · FSP 53208

1. Introduction

This Conflict of Interest Management Policy outlines the procedures and guidelines that Silverhurst Wealth Partners follows to identify, manage, and mitigate conflicts of interest effectively. As an FSCA-registered Financial Services Provider (FSP) in South Africa, the Company is committed to maintaining the highest standards of integrity, professionalism, and transparency in all its dealings.

2. Scope

This Policy applies to all employees, directors, representatives, and agents of the Company who are involved in the provision of financial services, including advising clients, managing investments, and executing transactions.

3. Definitions

- **Conflict of Interest:** Any situation where the Company's interests or those of its employees, representatives, or associates conflict with the interests of clients, potentially leading to biased decision-making or unfair treatment.
- **Related Person:** Any individual or entity associated with the Company, including employees, directors, representatives, shareholders, affiliates, and business partners.

4. Identification of Conflicts of Interest

The Company is committed to identifying potential conflicts of interest that may arise, including:

- Personal relationships with clients or third parties
- Financial interests in client transactions or investments
- Receipt of gifts, entertainment, or other benefits from clients or third parties
- Dual roles or responsibilities that may compromise objectivity
- Business relationships with related persons or entities

5. Management and Mitigation

- **Disclosure:** Whenever a conflict of interest arises, the Company will disclose the nature and extent of the conflict to affected parties, including clients, regulators, and other stakeholders.
- **Avoidance:** Where possible, the Company will take measures to avoid conflicts of interest altogether.

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- **Controls and Procedures:** The Company implements internal controls and procedures to prevent conflicts of interest from adversely affecting client outcomes, including segregating duties and establishing clear reporting lines.
- **Remuneration Policies:** Compensation structures are designed to align with the best interests of clients and promote ethical behaviour. Medical aid broker commission is regulated by the CMS at 3% of the total premium or R125.86 per member family, whichever is lower — it does not vary by plan richness, eliminating a common conflict vector.

6. Training and Awareness

The Company provides regular training and education to employees, representatives, and other relevant stakeholders to raise awareness of conflicts of interest and ensure compliance with this Policy.

7. Review and Monitoring

This Policy is subject to regular review and monitoring to ensure its effectiveness and relevance. The Compliance Officer oversees implementation and makes recommendations for updates as necessary.

8. Reporting

Employees, representatives, and other stakeholders are encouraged to report any actual or perceived conflicts of interest promptly to the Compliance Officer.

9. Compliance and Enforcement

Non-compliance with this Policy may result in disciplinary action, up to and including termination of employment or contractual relationships.

Date of Approval: 15 September 2023