

Conflict of Interest Management Policy

1. Introduction

This Conflict of Interest Management Policy ("Policy") outlines the procedures and guidelines that Silverhurst wealth Partners ("the Company") 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 but not limited to 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 in the course of its business activities. Conflicts of interest may arise from various sources, including but not limited to:

- 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 of Conflicts of Interest

The Company employs the following strategies to manage and mitigate conflicts of interest:

- **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. This may include refraining from engaging in certain activities or transactions that could give rise to conflicts.

- **Controls and Procedures:** The Company will implement internal controls and procedures to prevent conflicts of interest from adversely affecting client outcomes. This may involve segregating duties, implementing review processes, and establishing clear reporting lines.
- **Remuneration Policies:** The Company will ensure that remuneration policies and incentives do not create or exacerbate conflicts of interest. Compensation structures will be designed to align with the best interests of clients and promote ethical behaviour.

6. Training and Awareness

The Company will provide regular training and education to employees, representatives, and other relevant stakeholders to raise awareness of conflicts of interest and ensure compliance with this Policy. Training programs will cover topics such as identifying conflicts of interest, disclosure requirements, and ethical decision-making.

7. Review and Monitoring

This Policy will be subject to regular review and monitoring to ensure its effectiveness and relevance. The Compliance Officer or designated committee will oversee the implementation of the Policy and make recommendations for updates or revisions as necessary.

8. Reporting

Employees, representatives, and other stakeholders are encouraged to report any actual or perceived conflicts of interest promptly. Reports should be made to the Compliance Officer or designated supervisor for appropriate investigation and resolution.

9. Compliance and Enforcement

Non-compliance with this Policy may result in disciplinary action, up to and including termination of employment or contractual relationships. The Company is committed to enforcing this Policy consistently and fairly across all levels of the organization.

10. Conclusion

The Company is committed to upholding the highest standards of integrity, transparency, and professionalism in all its dealings. This Conflict of Interest Management Policy serves as a framework for identifying, managing, and mitigating conflicts of interest effectively to safeguard the interests of clients and maintain trust and confidence in the Company's services.

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