

Conflict of Interest

1. Introduction

This Policy is drafted in terms of section 3A (2) (a) of the FAIS Act General Code of Conduct for Financial Services Providers and Representatives and the Financial Services Board Notice number 58 of 2010 which amended the Code of Conduct by introducing amended provisions relating to Conflict of Interest.

First Step Life & Investment Planners (Pty) Ltd (“the Company”) is a registered Financial Services Provider with the Financial Services Board with license number 34137. The Company is wholly owned by First Holdings Limited.

As an authorized FSP, the Company is obliged to comply with the prescribed Conflict of Interest provisions of the FAIS Act. All employees of the Company who are involved in the business of the Company are obliged to conduct themselves in a professional manner and in line with this Policy.

2. Purpose of this Policy

This Policy seeks to adopt measures to avoid any conflict of interest, identify the existence of any conflict of interest, and to disclose the existence of Conflict of Interest. Further, it seeks to set out the process, procedures and internal controls to facilitate compliance with the Policy as well as to highlight the consequences of non-compliance with the Policy by the Company’s employees and representatives.

3. Guideline

This Policy is by no means an exhaustive analysis addressing every conflict of interest situation that might arise. The Policy provides a guide as to what constitutes a conflict of interest, the processes and procedures that are in place in order to facilitate compliance and, the consequences of non-compliance. The Policy is intended to assist employees in making the right decisions when confronted with potential conflict of interest issues.

4. Leadership

The Company’s Board of Directors oversees the business of the Company including the compliance with all applicable legislation, and this Policy. Management plays a key role in the application of this Policy and is expected to demonstrate their personal commitment to this Policy and ensure the compliance by employees, accordingly.

Management is obliged to maintain a workplace environment that nurtures and ensures compliance with this Policy.

5. The policy applies to

All directors, officers, employees, representatives, associates, brokers and consultants of the Company are required to comply with this Policy. The Policy applies across the whole spectrum of the Company's business.

An associate in terms of Section 1 of the General Code of authorized Financial Services Provider and Representatives, in relation to a juristic person – which is a company, means any subsidiary or holding company of that company, any other subsidiaries of that holding company and any other company of which that holding is a subsidiary.