



Conflict of Interest Management Policy

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Ramin is an authorized FSP registered with the FSCA with FSP No. 51897

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1. Introduction

At Ramin Financial Services, we are committed to upholding the highest standards of integrity, transparency, and professionalism in all our dealings. As part of this commitment, we recognize the importance of effectively managing conflicts of interest to ensure the fair treatment of our clients and the integrity of our services. This Conflict of Interest Management Policy document outlines the principles, procedures, and responsibilities that guide our approach to identifying, preventing, and managing conflicts of interest within our organization.

2. Definitions

2.1 Conflict of Interest

Conflict of Interest refers to any circumstance in which a provider or representative has an actual or potential interest that may:

- Influence the objective performance of their obligations to a client.
- Prevent them from providing unbiased and fair financial services to a client, or from acting in the client's best interest.

This includes, but is not limited to:

- Financial interests
- Ownership interests
- Any relationship with a third party

2.2 Financial Interest

Financial Interest encompasses any form of benefit, excluding ownership interests, such as cash, vouchers, services, hospitality, or any other valuable consideration.

2.3 Immaterial Financial Interest

Immaterial Financial Interest denotes a financial interest with a determinable monetary value not exceeding R1,000 in a calendar year, received by a sole proprietor, representative, or aggregated by a provider.

2.4 Ownership Interest

Ownership Interest includes any equity or proprietary interest acquired with fair value, excluding interests held as an approved nominee for another person.

2.5 Third Party

Third Party denotes:

- Product suppliers
- Other providers
- Associates of product suppliers or providers

- Distribution channels
- Any entity providing financial interests to a provider or its representatives under an agreement or arrangement

2.6 Associate

Associate encompasses:

- Spouses, life partners, or civil union partners
- Children, parents, or stepparents
- Commercial partners
- In the case of juristic persons, any entity under common control or direction

2.7 Distribution Channel

Distribution Channel refers to arrangements facilitating support or services between product suppliers, providers, or their associates.

3. Purpose of a conflict-of-interest management policy

This policy aims to ensure compliance with the Financial Advisory and Intermediary Services Act by:

- Establishing internal controls for identifying conflicts of interest
- Implementing measures to avoid or mitigate conflicts
- Ensuring proper disclosure of conflicts
- Communicating consequences of non-compliance

4. Identifying a conflict of interest

4.1 Individual Identification

The responsibility for identifying conflicts rests with representatives, employees, and governing body members, who must consider:

- Situations influencing objective performance
- Impartiality in providing financial services
- Acting in the client's best interest

If any question is answered affirmatively, a potential conflict is identified and further questions are posed regarding financial or ownership interests and third-party relationships.

4.2 Further Guidance

A conflict of interest may influence objective performance or impair impartiality in service provision. Financial interests must be commensurate with services rendered, and undue influence must be avoided.

4.3 Internal Controls

Internal controls include:

- Annual reviews of contracts with third parties

- Quarterly conflict of interest declarations
- Maintenance of gift registers
- Immediate disclosure of conflicts by relevant personnel

5. Avoiding and mitigating a conflict of interest

Upon identifying a conflict, the governing body evaluates its avoidability. Unavoidable conflicts are mitigated through transparent measures, and continuous reassessment is conducted.

6. Disclosure of conflict of interest

Disclosure to clients is essential, providing details of the conflict, measures taken, and access to the Conflict of Interest Management Policy.

7. Compliance Measures

The governing body ensures compliance by:

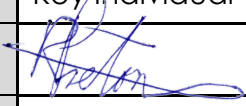
- Keeping the policy in the Compliance Manual
- Educating personnel and associates
- Quarterly conflict of interest declarations
- Regular policy reviews
- Publication of the policy for public access

8. Consequences of Non-compliance

Non-disclosure of conflicts may lead to disciplinary action, including dismissal, to safeguard the interests of the FSP, clients, and third parties.

9. Policy adoption

By signing this document, I grant authorization for the policy owner to approve and implement the processes and procedures detailed herein.

Name & Surname	Rulich Pretorius
Capacity	Key Individual
Signature	
Date	2024-04-19
Name & Surname	Willem van Staden

Capacity	Director
Signature	
Date	2024-04-19
Version	4
Publishing Date	April 2024
Last Review Date	n/a
Frequency of Review	Annually
Next Review Date	April 2025
Policy Owner	Willem van Staden

10. Review and Updates

This Conflict of Interest Management Policy will be reviewed regularly to ensure its effectiveness and relevance in light of changing business practices, regulatory requirements, and industry standards. Updates will be made as necessary to address new or emerging conflicts of interest.

11. Conclusion

Ramin Financial Services is committed to maintaining the trust and confidence of our clients by managing conflicts of interest effectively and transparently. By adhering to the principles and procedures outlined in this policy, we demonstrate our dedication to upholding the highest standards of integrity and professionalism in all our activities.