



ACRAVEST

T: +27 (0) 12 941 9927 | F: +27 (0) 86 633 4166 | E: info@iretire.co.za
Castle Walk Corporate Park, Block B, Cnr Nossob & Swakop Str, Erasmuskloof, 0084



ACRAVEST

CONFLICTS OF INTEREST MANAGEMENT POLICY

Administrator of *[t]retire* platform

AcraVest (Pty) Ltd | Reg no: 2005/013470/07 | FSCA No: 24/424
Directors: CJ Potgieter, M Potgieter | www.acraVest.com
AcraVest is an authorized FSP: 43176



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1. INTRODUCTION:

The General Code of Conduct for Financial Services Providers and Representatives (the “Code”) published in terms of the Financial Advisory and Intermediary Services Act, No. 37 of 2002 (“FAIS”), requires every Financial Services Provider (“FSP”) to adopt, implement and maintain a Conflict of Interest Management Policy.

Conflict of interest is defined as any situation in which a provider or a representative has an actual or potential interest that may, in rendering a financial service to a client,-

- 1.1 influence the objective performance of his, her or its obligations to that client; or
- 1.2 prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client, including but not limited to

- 1.2.1 a financial interest;

- 1.2.2 an ownership interest;

- 1.2.3 any relationship with a third party;

All Employees of AcraVest (Pty) Ltd, must perform their duties independently and act in the best interests of AcraVest existing and potential clients. Accordingly, this Policy applies to any staff who have entered into a permanent, fixed term or temporary contract of employment with AcraVest.

- 1.3 In considering potential Conflicts of Interest, AcraVest considers:

- 1.3.1 the structure and business activities; and

- 1.3.2 any proposed new business activities of AcraVest.

AcraVest is obliged to render unbiased and fair financial services to clients. Accordingly, we must take all reasonable steps to avoid any business activities and/or practices that may create conflicts of interest between AcraVest and employee interests, and the interests of clients. In the event that it is not possible to avoid a conflict of interest, AcraVest will take all reasonable steps to mitigate the impact as well as appropriately disclosing any such conflict of interest to clients.

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2. PURPOSE OF THE POLICY:

The purpose of this policy is primarily to provide mechanisms for the identification and management of conflicts of interest that may arise in the rendering of financial services to clients.

3. MECHANISMS TO IDENTIFY AND MANAGE ACTUAL OR POTENTIAL CONFLICTS OF INTEREST:

3.1 All employees are required to report any potential or actual conflicts of interest to the Compliance Department. The onus is on every employee to comply with this Policy.

Should any individual be uncertain as to whether they are in a conflicted situation e.g. whether the offer they wish to make or the offer which has been made to him/her, or whether a particular action or omission amounts to a conflict of interest, then he/she should contact the Compliance Department immediately.

3.2 Every manager, representative and key individual must, on an ongoing basis, identify any actual or potential conflicts of interest which may arise within his or her area to determine whether such conflicts of interest are avoidable or unavoidable conflicts. These must be reported to the Compliance Department.

3.3 If a conflict of interest is identified as being avoidable, then AcraVest must adopt the necessary internal procedures to ensure that the activity that gives rise to the avoidable conflict is avoided.

3.4 If a conflict of interest is identified as being unavoidable, a strategy to mitigate the risk of such conflict of interest impacting negatively on AcraVest ability to render fair and unbiased services to affected Clients must be developed.

3.5 AcraVest will disclose any specific conflict of interest impacting a client to such impacted client, together with the mitigation strategy employed.

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4. GUIDELINES IN RELATION TO FINANCIAL OR OWNERSHIP INTERESTS:

- 4.1 No employee may accept or give a financial interest or ownership interest from or to a third party,
- 4.2 AcraVest may not offer any financial interest to an employee which incentivizes such employee to:
 - 4.2.1 Give preference to the quantity of business over quality of service rendered to clients;
 - 4.2.2 Give preference to a specific product supplier in the event that it is possible to recommend more than one supplier to a client; and/or
 - 4.2.3 Give preference to a specific product in the event that it is possible to recommend more than one product to a client.

5. REPRESENTATIVE'S ENTITLEMENT TO FINANCIAL INTEREST

- 5.1 As consideration for providing services to clients, representatives are entitled to remuneration by salary and other benefits in terms of their contracts of employments.
- 5.2 No employee may receive a financial interest that leads to a potential conflict of interest between the employee and any clients.
- 5.3 No employee may be remunerated in such a way that encourages that employee to contravene this policy.

6. MANAGEMENT OF CONFLICTS OF INTEREST

- 6.1 Once an actual or potential conflict of interest has been identified, it must be reported to the Compliance Department in the prescribed manner (**Annexure A**)
- 6.2 The Compliance Department will keep a record of all actual or potential conflicts of interest in the register.
- 6.3 All employees are required to declare on an annual basis that they have complied with the policy and related policies.
- 6.4 The policy and related policies are reviewed annually, and where necessary, updated to ensure that the provisions remain sufficient to identify, assess, evaluate and mitigate conflicts of interest.



7. CONSEQUENCES FOR NON-COMPLIANCE

If any employee fails to comply with the contents of this policy or avoids same through any means, it will be regarded as a breach of his/her employment contract. This will potentially render the individual liable to sanction under disciplinary procedures.

Acravest Conflict of Interest Log Document

Log Date: XXXXX

Log Number: xxx

Refer to pre-numbered register. Utilize next un-used number

Register Maintained By: Compliance Department

Introduction:

The Conflict-of-Interest Register is maintained to identify, document, and manage any potential or actual conflicts of interest that may arise within Acravest. All employees and representatives are responsible for promptly reporting any conflicts of interest they become aware of, and this register is updated regularly to monitor and address such conflicts in compliance with applicable regulations, including the Financial Advisory and Intermediary Services (FAIS) Act.

1. General Information on specific conflict:

1.1 Conflict Identifier:

- Date Identified:
- Employee/Representative Name:
- Department/Role:

1.2 Nature of Conflict:

- Describe the nature of the conflict of interest.

1.3 Conflict Impact:

- Potential impact on clients, the firm, or other parties.

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2. Parties Involved:

1.1 Employee/Representative:

- Name:
- Employee/Representative ID:
- Job Title:

1.2 Related Parties:

- Name of the related party or organization involved (if applicable).

3. Conflict Mitigation:

3.1 Conflict Mitigation Plan:

- Describe the steps taken or planned to mitigate the conflict of interest.

4. Disclosure and Consent:

4.1 If applicable, indicate if disclosure to the client or affected parties was made, and their consent obtained.

5. Review Date: (Compliance)

5.1 Date for periodic review of the conflict and mitigation measures.

6. Outcome:

7. Resolution Status: (Compliance)

7.1 Resolved

7.2 Ongoing

7.3 Unresolved

8. Review Comments: (Compliance)

8.1 Any additional comments or observations regarding the conflict and its resolution.

9. Additional Information:

10. Supporting Documents:

10.1 Attach relevant documents, emails, or correspondence related to the conflict (if applicable).

11. Reporting to Compliance: (Compliance)

11.1 Date and details of the conflict report submitted to the compliance department (if applicable).

12. Regulatory Compliance: (Compliance)

12.1 Ensure compliance with FAIS Act and other applicable regulations.

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13. Signature and Approval:

13.1 Registered By:

- Name:
- Title:
- Date:

13.2 Approval (if applicable): **(Compliance)**

- Name:
- Title:
- Date:

13.3 Compliance Review (if applicable):

- Name:
- Title:
- Date:

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Conflict register

Registration #	AcraVest managed entity	Date	Conflict assessed by	Resolved (Y/N)	Compliance sign off	Sign off date
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						

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Summary

Item	30/06/2023		31/07/2023		31/08/2023		30/09/2023
Conflict Identifier							
Nature of Conflict							
Conflict Impact							
Employee/Representative							
Related Parties							
Conflict Mitigation Plan							
Disclosure and Consent							
Review Date							
Review outcome							
Resolution Status							
Review Comments							
Supporting Documents							
Reporting to Compliance							
Regulatory Compliance							
Registered By							
Approved?							
Compliance Review							

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