



ELEVATION WEALTH
GROWTH THROUGH GUIDANCE

Elevation Wealth (Pty) Ltd.
Reg. 2018/023112/07
FSP 49312

Conflict of Interest Management Policy



1. PURPOSE

The purpose of this Conflict of Interest Management Policy is to outline a suitable approach and response to the identification and management of conflict of interest.

This policy is intended to comply with the General Code of Conduct for Financial Services Providers and Representatives, as amended (“Code of Conduct”) gazetted in Board Notice 80 of 2003, and amended by Board Notice 43 of 2008. This policy was adopted by the board of directors of Elevation Wealth (Pty) Ltd "Elevation" and is applicable to the authorised Financial Services Provider (FSP) as defined in the Financial Advisory and Intermediary Services Act (FAIS). The FSP must at all times render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry.

2. DEFINITIONS

The definitions used in FAIS and the Code of Conduct are brought forward into this policy as defined:

2.1 **“Associate”** is defined, in the case of a company or FSP, as “any subsidiary or holding company of that company or FSP, any other subsidiary of that holding company and any other company of which that holding company is a subsidiary;

2.2 **“Conflict of Interest”** means any situation in which a FSP or representative of that FSP has an actual or potential interest that may, in rendering a financial services to a client, -

- (a) Influence the objective performance of his/her or its obligation to that client, or
- (b) Prevent a FSP or its representative from rendering an unbiased and fair financial service to that client, or from acting in the best interest of that client,

Including, but not limited to –

- (i) A financial interest;
- (ii) An ownership interest;
- (iii) Any relationship with a third party

2.3 **“Employee”** means any permanent or temporary employee, director, officer, independent contractor of Elevation.

2.4 **“financial interest”** means any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount or foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration, other than-

- (a) An ownership interest;
- (b) Training, that is not exclusively available to a selected group of providers or representatives, on-
 - (i) Products and legal matters relating to those products;
 - (ii) General financial and industry information;