

CONFLICT OF INTEREST POLICY

SNYMAN & VAN DER VYVER FINANCIAL SERVICE (PTY) LTD

FSP: 13455

Aim

In terms of the General Code of Conduct Board Notice 80 of 2004 as amended by Board Notice 58 of 2010 and BN706 of 2020, it is required that a FSP must maintain and operate effective controls and measurements, taking reasonable steps to identify, monitor and manage conflict of interest to safeguard its clients' interest and ensure fair treatment of clients.

Scope

It is the objective of this policy to provide adequate conflict of interest management where all providers, Key Individuals, Representatives, associates and administrative processes, will ensure that the quality of financial services is not compromised, professionalism levels will be maintained and client will receive best advice. It will further ensures that full disclosures are made to the client where a conflict of interest exists. In addition, all staff must make a declaration as to whether a conflict of interest exist between themselves, the FSP, a client or a supplier of the FSP. This policy addresses mechanisms for identification of conflict of interest, avoidance of conflict of interest or mitigation where avoidance is not possible and disclosure of conflict of interest.

Application

Snyman & Van Der Vyver Financial Service (Pty) Ltd ("the FSP"), its employees and representatives contracted to the FSP (FAIS representatives) are bound by this policy.

Commitment

The FSP commits itself to conducting its business honestly, fairly and ethically wherever we operate in the world. We constantly improve the quality of our services, products and operations and strive to create and maintain our reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. No illegal or unethical conduct on the part of officers, directors, employees or affiliates is in the business's best interest.

The business will not compromise its principles for short-term advantage. The ethical performance of this business is the sum of the ethics of the men and women who work here; thus, we are all expected to adhere to high standards of personal integrity.

We acknowledge that operating a business naturally creates conflicts which might increase reputational risk; it is further for this reason that a Conflict of Interest Policy is fully subscribed to by all stakeholders.

Conflict of Interest

A conflict of interest may exist when a director or employee is involved in an activity or has a personal interest that might interfere with his or her objectivity in performing business duties and responsibilities.

Such conflicts may appear as favoritism or otherwise damage the reputation of the business or its employees. An actual conflict of interest does not need to be present to constitute a violation of this procedure. Activities that create the appearance of a conflict of interest must also be avoided to ensure that the reputation of the business and its employees are not harmed.

Personal interests of employees must not influence or appear to influence business transactions. This procedure provides the requirements for managing, avoiding and disclosing potential conflicts of interest and the process for obtaining a conflict of interest review.

The purpose further of this document is to provide our clients with appropriate information in relation to the policies we have in place to manage conflicts of interest.

Where a conflict of interest exist, disclosure is made to the FSP and interested parties and a management program is launched.

Annexure A lists financial interests that are allowed; financial interest that are allowed, but subject to prior approval and the total expenditure not exceeding R1000.00 per FAIS representative during any one year; financial interests that are disallowed; and financial interests

that are not subject to the Code and therefore does not require any prior approval in terms of this Policy.

Representative Incentives and Remuneration

Our representatives are remunerated by commission only as authorised under the Short Term Insurance Act of 1998. All fees received are in terms of the Short Term Insurance Act of 1998. In addition, commissions and fees are received only where the client has agreed to it in writing and fees may be stopped at the discretion of that client.

We strive to ensure our employees remain motivated whilst at the same time ensuring this remuneration scheme does not encourage inappropriate behavior. We recognise this conflict and through our monitoring mechanisms remain alert to potential abuse. It is the policy of the business that no representative shall be remunerated or receive a financial interest as part of an incentive structure with its main or sole aim to increase production. Incentives and production bonuses must take into account a combination of quantitative and qualitative criteria; and not limited to a specific product supplier; and- not limited to a specific product.

Any incentive or bonus scheme must be approved by **Johan Snyman** in writing prior to being implemented. All incentive projects must be disclosed to clients of the business and must be attached to this policy, together with a description of the nature and basis of participation and any other rules as well as the duration of the incentive project.

The FSP or its representatives does not tolerate or accept any financial interest from a provider:

- (i) that is determined with reference to the quantity of business secured for the provider without also giving due regard to the delivery of fair outcomes for clients; or*
- (ii) for giving preference to a specific product supplier, where a representative may recommend more than one product supplier to a client; or*
- (iii) for giving preference to a specific product of a product supplier, where a representative may recommend more than one product of that product supplier to a client*

The FSP ensures that all monies paid to a representative takes into account:

- (i) achievement of minimum service level standards in respect of clients; and*
- (ii) delivery of fair outcomes for clients;*

(iii) *quality of the representative's compliance with this Act;*

With sufficient weight is attached to such indicators to materially mitigate the risk of the representative giving preference to the quantity of business secured for the provider over the fair treatment of clients.

Identifying conflict of interest

The “trust test” must be applied to identify and establish conflict of interest. The “trust test” entails enquiring whether one’s clients or the public would trust one’s judgment if they knew that one was involved in a particular situation or activity. If the answer to this enquiry is “yes”, then the situation or activity does not give rise to a conflict of interest. However, if the answer is “no” or “maybe”, then that particular situation or activity is likely to give rise to an actual or potential conflict of interest.

Irrespective of the “trust test”, a conflict of interest will be deemed to have arisen if the FSP provides “disallowed financial interest” as listed above or incurs expenditure in excess of R1000.00 per FAIS representative per annum. To adequately manage conflicts of interest, the business must identify all relevant conflicts timeously.

Two levels of identification are employed:

Business level: The managing body will annually identify an index of potential conflict risks. The index is updated with all new conflicts identified, and to ensure completeness is reviewed on an annual basis;

Employee level: All employees, including compliance officers and management, are responsible for identifying specific instances of conflict and are required to notify their manager of any conflicts they become aware of. They are further required to disclose all conflict of interest as they may arise and where there is no conflict of interest attest to the fact.

Management of Potential or Actual Conflict of Interest

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In managing conflicts of interest, our procedure is to:

- *identify the conflicts of interest;*
- *assess and evaluate those conflicts; and*
- *decide upon, and implement, an appropriate response to those conflicts*

The following is a list of possible management strategies to manage the potential or actual conflict of interest:

- *Avoid the conflict of interest*
- *Mitigate the impact*
- *Where this is not possible, full disclosure of the Conflict of interest (COI.)*
- *Implement a strategy to manage the conflict of interest where it cannot be avoided*

Material conflicts:

Where a conflict will have a serious potential impact on our clients or our business, it must be avoided. Only **Johan Snyman** or person authorised by him may make the final decision regarding a material conflict and whether the management process must be followed. Officers, directors and employees must avoid representing the business in any transaction with others with whom there is any outside business affiliation or relationship. Officers, directors, and employees must avoid using their business contacts to advance their private business or personal interests at the expense of the business, its clients or affiliates. Officers, directors, and employees of the business must never permit their personal interests to conflict, or appear to conflict, with the interests of the business, its clients or affiliates.

This may include but is not exclusive to:

- *Real or perceived financial gain resulting from recommendations to our clients at a cost to the client.*
- *An outcome in service delivery or a transaction that may differ from the real interest of the client.*
- *Any non-cash incentives that may be received by the business from affecting any transaction and / or product.*

- *Effecting a transaction and / or product that may result in a benefit to another party other than the client.*

Disclosure and Record Keeping

It is this business policy to avoid all possible conflicts of interest, but if this is not possible, then full disclosure of this conflict must be made in writing to our clients.

Our clients will be adequately informed about any conflicts of interest that might affect the provision of financial services to them. This means providing clear, concise and effective disclosure so that clients can make an informed decision about how the conflict might affect the relevant service.

Where a conflict is identified and a decision made, the nature of the decision must be communicated to the third party in writing as soon as possible. This applies regardless of whether the decision was made to stop doing business or continue with the business, despite the existence of the conflict.

Written records of how conflicts of interest are managed, together with all reports referred to, must be kept for a period of 5 years and be available for inspection by the compliance officer on request. (for example, records of disclosures made and actions taken over any breaches of policies and procedures).

Avoidance and Mitigation of Conflicts of Interest

All expenditure incurred that forms part of “immaterial financial interest” will require the written consent of the Manager of the relevant Business Unit and must be recorded in the relevant conflict of interest register (refer to **Annexure C**). “Immaterial financial interest” is a financial interest with an aggregate value of R1000.00 or less, given to or received from the same FAIS representative, in any given year.

In exercising his discretion, the Manager must have regard to:

- *the relevant conflict of interest register;*

- *any commission regulations or other laws which may be breached by the receipt of such gift or entertainment; and*
- *a written statement from the giver explaining the reason for and purpose of the entertainment or gift that must accompany any request for authorisation.*
- *has an appetite to assume the risk, in light of the answers to the above considerations.*

If it has been established that a particular situation or activity gives rise to a conflict of interest, one must avoid that situation or refrain from that activity. However, if it is not possible to avoid the situation or refrain from the activity that gives rise to a conflict of interest, as confirmed by the Head of the affected FSP Business Unit, the Head of that Business Unit shall, prior to approving the relevant situation or activity:

- *establish the extent to which a specific intermediary is conflicted, i.e. the extent to which the intermediary acts on behalf of the FSP whilst also acting on behalf of a FSP policyholder/client;*
- *establish the extent to which FSP's reputation would be damaged, if the situation or activity giving rise to a conflict of interest were to be brought to the public's attention;*
- *establish the estimated direct financial impact that a particular situation or activity would have on the FSP;*
- *consider how the financial interest is likely to affect the policyholder; and consider whether FSP.*

Decisions pertaining to particular potential conflict of interest situations that fall within the definition of a "material conflict" of interest must be taken in consultation with the Executive Head of the affected Business Unit. "Material conflict" is a conflict of interest whose monetary value exceeds R10 000.00 or that will directly impact the FSP's reputation.

Once it is decided that a conflict of interest is inevitable, the Head of the affected Business Unit must ensure that the effect of such conflict is mitigated by putting mitigation measures in place, including:

- *cost-sharing; or*

- *delivering a written communication to the relevant FSP, bringing the conflict of interest to the FSP's attention; and/ or*
- *requesting that the FSP puts mitigating measures in place, including proactively disclosing the inevitable conflict to affected policyholders, in line with its conflict of interest management policy or in accordance with the Code if the policy is not yet in place.*

Each FAIS representative has a duty to track any immaterial financial interest given to him or her by the FSP, and to advise his or her Relationship Manager accordingly, as soon as the FSP's expenditure reaches R1000.00 in that particular year.

Where a conflict is identified and a decision is made in respect of the management thereof, the nature of the decision must be communicated to the FSP in writing as soon as possible. The FSP must in turn disclose the conflict to the policyholder. This applies regardless of whether the decision was made to cease with the relevant activity or continue therewith despite the existence of the conflict or potential conflict. It is important for the preservation of the corporate integrity of the FSP that these disclosures are made at all times.

Management Internal Controls

Before entering into any third party agreement, the FSP will conduct a due diligence to satisfy itself that no conflict of interest exist between the parties or where there is a conflict of interest, that such conflict of interest is properly managed, TCF principles are adhered to and that the product/ or service levels to the clients are what clients may expect and that a conflict of interest that exists does not compromise the level of service. The executive committee of the business or any other appropriate forum or person will review all conflicts every quarter and make recommendations regarding steps to avoid a recurrence of those aspects.

We regularly monitor the third party's customer treatment standards, including how the third party meets customer expectations

Johan Snyman will accept responsibility for the implementation of all steps necessary. Notice of the attention paid to conflict of interest must be contained in the minutes of the meetings of the Executive/ Key Individuals and the relevant extracts of the minutes must be made available to

the business's compliance officer on request, to enable the external compliance officer to report on compliance with this policy.

Reporting

The outcome of the conflict of interest register audit shall be reported to the Chief Executive Officer, the FAIS compliance officer and the FAIS-appointed key individuals of the FSP.

Heads of Business Units who have engaged in activities that have given rise to conflict of interest situations are obliged to disclose to Snyman & van der Vyver Financial Service Executive Committee the detail pertaining to such activities, including the mitigation measures taken. This will be done on a quarterly basis and must include recommendations regarding steps that will be taken to avoid a recurrence of such conflict of interest situations.

Discussions regarding conflicts of interest by the Executive Committee during their committee meetings must be recorded in the minutes of such meetings. The relevant extracts of the minutes must be made available to the FAIS compliance officer upon request, for the purpose of enabling the FAIS compliance officer to report on compliance with this Policy, as required by the Code.

Gifts and Inducements

The official policy of the business is as follows: No bribes, kickbacks or other similar remuneration or consideration shall be given to any person or organisation in order to attract or influence business activity. Officers, directors and employees shall avoid gifts, gratuities, fees, bonuses or excessive entertainment, in order to attract or influence business activity.

Any gifts or gratuities over the value of R1000 (annual calendar year total) from any other person or their associate as defined in Financial Services Board Notice 58 of 2010 may not be accepted by any person in the organization and neither may such gifts or incentives be given by any person in the business, to any third party. No gifts or gratuities may be accepted or given without written consent from **Johan Snyman**.

In exercising discretion, **Johan Snyman** must have regard to any commission regulations or other laws which may be breached by the receipt of such gift. A written statement from the giver explaining the reason for and purpose of the gift must accompany any request for authorisation. This provision also applies to invitations to any functions, including lunches, dinners, training interventions and prize-giving. The Gifts register may be an electronic register and care must be taken to mitigate the risk of tampering.

The gifts register shall be audited by the Compliance Practice regularly to ensure that incentives did not exceed the aggregate value of R1 000.00. The results of the audit shall be communicated to the CEO. In determining whether any gift or incentive is to be allowed, the CEO shall have regard to this report.

Examples of Conflict of Interest

Personal interests may include working relationships and/or financial interests with immediate family members or relatives. Activities include outside employment in areas similar to those in which the Business is involved;

- *Outside work for clients, suppliers, vendors, or competitors of the business;*
- *Operating as a supplier to the business;*
- *Activities that have the potential to affect the staff member's objectivity;*
- *Activities that could reflect negatively on the reputation of the business and its employees.*
- *Holding a financial interest in a business concern that is a supplier, client, partner, subcontractor, or competitor of the business constitutes a conflict of interest under certain conditions.*
- *Incentive remuneration for placing a quantity of business with only 1 supplier, or for only 1 product of a supplier where a choice is available*
- *Participating in any activity that might lead to or give the appearance of unapproved disclosures of the business' confidential information or client confidential information*
- *Using an official position to obtain special privileges or advantages from individuals or businesses*

- *An employee, officer or director may serve on external non-profit, governmental or for-profit governance boards, however if such service in any way could create an actual or perceived conflict of interest, the services must be disclosed, and approved by the governing body of the business*

No person may receive or solicit outside employment, including paid service on a governance board, or compensation that would impair the independence of judgment of the individual in performing duties as an employee of the business.

Activities requiring full disclosure

We, or some other person connected with us may have an interest, relationship or arrangement that is material to the service, or transaction concerned.

To manage such conflicts, we require our staff members to fully disclose, and disregard when dealing with our clients:

- *Financial interest in any supplier, client or competitor entity.*
- *Acting as an employee, officer, director, consultant, representative, or agent for a supplier, client, partner, subcontractor, or competitor.*
- *Engaging in any activity that could create the appearance of a conflict of interest, which may impair the reputation of The Business for impartiality and fair dealing.*

Insider Trading

Officers, directors and employees of the business will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded. This information – whether it is on behalf of our business or any of our clients or affiliates – could include strategic business plans, operating results, marketing strategies, client lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs.

Processes and methods. Proprietary, confidential and sensitive business information about this business, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated on a need-to know basis. No disclosure of confidential information is permitted without written permission of the client or the most senior manager of this business. Misuse of material inside information in connection with trading in the business's securities can expose an individual to civil liability and penalties. Under current legislation, directors, officers, and employees in possession of material information not available to the public are "insiders".

Spouses, friends, suppliers, brokers, and others outside the business who may have acquired the information directly or indirectly from a director, officer or employee are also "insiders." The Act prohibits insiders from trading in, or recommending the sale or purchase of, the business's securities, while such inside information is regarded as "material", or if it is important enough to influence you or any other person in the purchase or sale of securities of any business with which we do business, which could be affected by the inside information.

The following guidelines should be followed in dealing with inside information:

- *Until the material information has been publicly released by the business, an employee must not disclose it to anyone except those within the business whose positions require use of the information.*
- *Employees must not buy or sell the business's securities when they have knowledge of material information concerning the business until it has been*
- *Disclosed to the public and the public has had sufficient time to absorb the information.*
- *Employees shall not buy or sell shares of another corporation, the value of which is likely to be affected by an action by the business of which the employee is aware and which has not been publicly disclosed.*

Officers, directors and employees will seek to report all information accurately and honestly, and as otherwise required by applicable reporting requirements. Officers, directors and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner. The officers, directors and employees

of the business will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

Staff Training and General Awareness

All the FSP's staff be aware of this policy and receive training on this policy.

A copy of the policy will be provided to each staff member at inception of that staff member's duties and updated versions must be circulated as and when they are updated.

It is the responsibility of **Johan Snyman** to ensure that the provisions of this paragraph are complied with.

All staff will sign an affidavit declaring that no conflict of interest exist between themselves and the FSP and where there is a conflict of interest, such conflict is declared to ensure the proper management thereof.

It is our policy to inform all clients of the existence of this policy, and make it available to such clients in the following manner:

- *Posting on website*
- *Sent to client on request*

Consequences of not adhering to the Policy

Violation of this Policy by a Snyman & van der Vyver Financial Service employee may result in disciplinary action being taken against the employee, in accordance with Snyman & van der Vyver Financial Service Disciplinary Code as amended from time to time.

Consequences of withholding information or inaccurate information

Provision of false or misleading information or concealment of material facts relating to activities logged or that must be logged in a conflict of interest register is, in addition to being a disciplinary action, a punishable offence. Such conduct can, on conviction, lead to a fine of up to R1 million or imprisonment for up to 10 years.

Associates

Conducting business with or via an “associate”, as defined in the Code, may inherently give rise to a conflict of interest, thus the FSP is required by the Code to make a list of its associates available to interested parties, together with this policy. The FSP structure, in which the FSP’s associates are listed, is attached as **Annexure B**.

Review of the Policy

This policy shall be reviewed by Senior Management, Key Individuals and the FAIS compliance officer annually and any changes to this policy shall be communicated to all staff and FSPs.

ANNEXURE A

| SNYMAN & VAN DER VYVER FINANCIAL SERVICE (PTY) LTD | | |
|---|--|--|
| Key individuals and Representatives – Financial Interest Received | | Insurer/FSP – Financial Interest Provided |
| Financial interest allowed | Disclosure required | Standard operating procedures |
| Commission, in accordance with the Short-term Insurance Act, 1998 (Act No. 53 of 1998) (“the STIA”) | Disclosed in Initial Disclosure document and quotation. | Financial interest disallowed: Financial interest to a FAIS representative for giving preference to a quantity of business to the exclusion of quality to the policyholder, preference to a specific product supplier, or preference to a specific product. |
| Fees as provided for in the STIA. | Disclosed in Initial Disclosure document and potentially in quotation. | Financial interest disallowed: Cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, and any other incentive or valuable consideration not mentioned above, including travel and accommodation |

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| | | associated with allowed training. |
| Fees for rendering a financial service in respect of which neither commission nor the fees provided for in the STIA are payable, provided the client has specifically agreed to the fees in writing and has a discretion to stop them at any time. | Disclosed in Initial Disclosure document and potentially in quotation. | Financial interest disallowed: Training that is restricted to a select group of providers or FAIS representatives and that does not meet the conditions in item 8 under the “Allowed Column” |
| Promotional items | Disclosed in internal gift register | Financial interest allowed: Marketing and advertising, provided a fair value for the service, as would have been charged elsewhere, is charged |
| Any financial interest with a determinable monetary value <u>not exceeding R1000.00</u> per FAIS representative/key individual in any given year. | Disclosed in internal gift register. | Financial interest allowed: Provision of electronic tools and services without which an FSP cannot service THE PRODUCT SUPPLIER, underwriting services, call centre services, etc |
| Financial interest for which the provider or FAIS representative has paid fair value or remuneration reasonably commensurate to the financial interest. | Disclosed in conflict of interest register. | Financial interest allowed: Provision of discount mandates to brokers who manage their books well |
| Ownership interest | Disclosed in conflict of interest register and | Financial interest allowed: Commission, in accordance with the Short-term Insurance |

| | | |
|--|---|--|
| | Ownership interest register. | Act, 1998 (Act No. 53 of 1998) (“the STIA”) |
| Training that is not restricted to a selected group of providers and FAIS representatives on products and legalities thereof; general financial and industry information; specialised technological systems (of a third party) necessary rendering a financial service. | No need to disclose. | Financial interest allowed: Any financial interest with a determinable monetary value <u>not exceeding R1000.00</u> per FAIS representative/key individual in any given year. |
| | | Financial interest allowed: Financial interest for which the provider or FAIS representative has paid fair value or remuneration reasonably commensurate to the financial interest. |
| Financial interest disallowed | Disclosure insufficient | Financial interest allowed: Ownership interest |
| Any financial interest with a determinable monetary value <u>exceeding R1000.00</u> per FAIS representative/key individual in any given year. This could be made up of 1 gift or of several gifts from one product supplier in one calendar year (as recorded in internal gift register). | Must be recorded in conflict of interest register. Gift may not be accepted. Refusal to accept gift must be recorded. | Financial interest allowed: Training that is not restricted to a selected group of providers and FAIS representatives on products and legalities thereof; general financial and industry information; specialised technological systems (of a third party) necessary rendering a financial service. |

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| | | Financial interest allowed: Promotional items |
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ANNEXURE B

Associates

| FSP Number | Product Supplier / Shareholder | Nature of ownership interest | Extent of ownership interest | Relevant Associates | Description of Role | Agreements / arrangements where a financial interest is provided to a provider or its representative |
|-------------------|---------------------------------------|-------------------------------------|-------------------------------------|---|----------------------------|---|
| 3416 | Santam Limited | Ownership Interest | 100% | Snyman & Van Der Vyver Financial Services (Pty) Ltd | Non-Mandated Intermediary | Intermediary Services Agreement Binder Holder Agreement |
| 3416 | Santam Limited | Ownership Interest | 55% | Mirabilis Engineering Underwriting Managers (Pty) Ltd (Mirabilis) | Underwriting Manager | Binder Holder Agreement |

SvdV and the underwriting managers noted above are considered associates of one another by virtue of Santam's interest in the respective entities.

An exemption application was approved by the FSCA in mitigation of the conflict of interest risks relating to the policies underwritten by Mirabilis subject to certain conditions.

Definitions:

1. **“Distribution Channel”** means:
 - (a) Any **arrangement** between a product supplier [or any of its associates] and one or more providers [or any of its associates] in terms of which arrangement, **any support or service** is provided to the provider/s in rendering a financial service to a client;
 - (b) Any **arrangement** between two or more providers [or any of their associates], which arrangement **facilitates, supports or enhances a relationship** between the provider/s and a product supplier;
 - (c) Any **arrangement** between two or more product suppliers [or any of their associates], which arrangement **facilitates, supports or enhances a relationship** between a provider or providers and a product supplier.
2. **“Ownership Interest”** means:
 - (a) An equity or proprietary interest, for which fair value was paid by the owner at the time of the acquisition, other than equity or a proprietary interest held as an approved nominee on behalf of another person; and
 - (b) Includes any dividend, profit share or similar benefit derived from that equity or ownership interest.
3. **“Provider”** means an authorized financial services provider, and includes a representative.
4. **“Product Supplier”** means any person who issues a financial product by virtue of an authority, approval or right granted to such person under any law, including the Companies Act, 1973.
5. **“Third party”** means:
 - (a) A product supplier;

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- (b) Another provider;
- (c) An associate of a product supplier or a provider;
- (d) A distribution channel;
- (e) Any person who in terms of an agreement or arrangement with a person referred to in paragraphs (a) to (d) provides a financial interest to a provider or its representative.

ANNEXURE C

| CONFLICT OF INTEREST REGISTER | | | | | | | | |
|---|--------------|-----------------|----------|-------------------|---|-----------------|------------------------------|--|
| Financial Advisory and Intermediary Services Act 2002 (FAIS) | | | | | | | | |
| <p>Purpose: To record the incidence of conflicts of interest by the FSP to ensure compliance with the requirements of the FAIS Act and other legislation. This register should act as a summary document with more detailed history contained in the conflicts file where appropriate.</p> | | | | | | | | |
| Ref No and ID of conflict | Received | Rec'd from | Rec'd by | Referred Internal | Description of conflict (add attachment no. or brief detail here) | Activity update | Status (SEE BELOW for guide) | OUTCOME-Description/Comments AND Learnings |
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| Version number | Last updated | Last Updated by | | | | | | |

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| 1 | 2019 | Len Faul |
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