

# CONFLICT OF INTEREST MANAGEMENT POLICY

## **OWNERSHIP**

This policy is owned by **HYPASURANCE INSURANCE CONSULTANTS (PTY)LTD**, a duly authorised Services Provider (hereunder referred to as FSP).

As Key Individual of the FSP I, **REGINALD THOMAS BESSELING** hereby confirm the adoption of this policy.

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**Key Individual Signature & Date**

# HYPASURANCE

Insurance Consultants (Pty) Ltd

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## INSTRUCTIONS

In terms of Section 3A(2)(a) of the General Code of Conduct "every provider, other than a representative, must adopt, maintain and implement a conflict of interest management policy that complies with the provisions of the Act."

A nominated Key Individual must acknowledge the FSP's ownership of the policy, by completing the FSP's name on the first page, and signing the policy.

A nominated Key Individual must complete and sign the annexure section of the policy (4 pages in total).

All Key Individuals and persons associated with the governing body of the FSP must confirm the adoption of this policy, by signing the document below (print additional copies of this page should the need arise).

All employees must read and confirm that they understand the contents of the policy, by signing the personnel acknowledgement page (print additional copies of this page should the need arise)

After implementing the policy, retain a hardcopy of this document as part of your compliance file. The policy must be accessible for public purposes. Refer back to the policy whenever an actual or potential conflict of interest manifests itself.

The policy must be read and understood in conjunction with the General Code of Conduct

This policy must be reviewed annually (the annexure section must be updated and signed annually)

## POLICY ADOPTION

By signing this document. I acknowledge the FSP's adoption of this policy.

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**Key Individual Signature & Date**

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**Compliance Officer Signature & Last Review Date**

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53 Soutpans Avenue Fairland 2195 P.O. Box 73247 Fairland 2030  
Tel (011) 678-7564 Fax 086 618 1870 admin@hypasurance.com www.hypasurance.com

Man. Director R.T. Besseling Cert.Estax(Unisa), AFP, CEA, Cert.Strtax(Unisa), Cert Advtax (Hons) (Unisa), AMCISA  
Registration No 72/07421/07  
FAIS Registration No. 9663  
Compliance Registration No. 1839

# HYPASURANCE

Insurance Consultants (Pty) Ltd

## ANNEXURE 1

### OWNERSHIP INTEREST (FSP):

In terms of Section 3A(2)(b)(v) of the General Code of Conduct, a conflict of interest management policy must include the names of any third parties in which the providers hold an ownership interest.

Refer back to the definition of "third party" & "ownership interest" and complete the form below. The nominated Key Individual and appointed Compliance Officer must sign and date the annexure. Print additional copies of this page should the need arise.

Name of 3 <sup>rd</sup> party in which the FSP holds an ownership interest	Nature and extent of ownership interest
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As Key Individual of the FSP I, **REGINALD THOMAS BESSELING** confirm the list of names of all third parties in which FSP hold an ownership interest.

\_\_\_\_\_  
**Key Individual Signature & Date**

\_\_\_\_\_  
**Compliance Officer Signature & Last Review Date**

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## ANNEXURE 2

### **BASIS OF REPRESENTATIVES FINANCIAL INTEREST:**

In terms of section 3A(2)(b)(ii) of the general Code of Conduct, a conflict of interest management policy must specify the type of and basis on which a representative will qualify for a financial interest that the provider will offer a representative, and motivate how that financial interest complies with section 3A(i)(b).

### **The FSP's representatives qualify for the following type(s) of financial interests**

**Commissions** as authorised under the Long Term Insurance Act, Short-term Insurance Act and the Medical Schemes Act.

**Fees** as authorised under the Long-term Insurance Act, Short-Term Insurance Act and the Medical Schemes Act if those fees are reasonably commensurate to a service being rendered

**Fees** for the rendering of financial services in respect of which the abovementioned commissions and fees are not paid, provided that the client agreed to such fees in writing and may be stopped at the discretion of the client.

**Fees** or remuneration for the rendering of a service to a third party, which fees or remuneration are reasonably commensurate to the service being rendered.

**An immaterial financial interest** (i.e. a financial interest with a determinable monetary value, the aggregate of which does not exceed R 1000 in any calendar year from the same third party in that calendar year received by – a provider who is a sole proprietor, or a representative for that representative's direct benefit, or a provider who for its benefit or that of some or all of its representatives, aggregates the immaterial financial interest paid to its representatives).

**A financial interest not referred to above**, for which a consideration, fair value or remuneration that is reasonably commensurate to the value of the financial interest, is paid by that provider or representative at the time of receipt thereof.

As Key Individual of the FSP I, **REGINALD THOMAS BESSELING** confirm the financial interest as indicated above and acknowledge compliance with section 3A(1)(b) of the General Code of Conduct.

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**Key Individual Signature & Date**

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**Compliance Officer Signature & Last Review Date**

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