



Camelot Wealth
(Pty)Ltd | FSP 54863 | Reg 2024/016417/07

Conflict of Interest (COI) Policy

1. Introduction

Camelot Wealth (Pty) Ltd (“the Company”) is committed to conducting business in a manner that is fair, transparent, and in the best interests of clients. We recognise that conflicts of interest (“COIs”) may arise in the course of providing financial services, and we are committed to managing such conflicts in line with the FAIS General Code of Conduct and the Treating Customers Fairly (TCF) principles.

2. Purpose of the Policy

The purpose of this policy is to:

- Identify actual or potential conflicts of interest in our business.
 - Outline procedures for avoiding or mitigating such conflicts.
 - Ensure that all conflicts are disclosed, documented, and appropriately managed.
 - Protect clients’ interests and maintain trust in our advice and services.
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3. Scope

This policy applies to:

- All directors, Key Individuals, representatives, and employees of Camelot Wealth.
 - All financial products and services offered by the Company.
 - All interactions with product suppliers, associates, and clients.
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4. Definition of Conflict of Interest

A conflict of interest means any situation where a financial or other interest of Camelot Wealth, its employees, or representatives may:

- Influence, or appear to influence, the objective performance of obligations to clients.

- **Prevent Camelot Wealth from rendering fair, unbiased, and impartial financial services.**
 - **Include direct or indirect interests, ownership, referral arrangements, or financial incentives.**
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5. Types of Conflicts of Interest

Potential COIs may include:

- **Ownership Interests: Direct shareholding in product suppliers.**
 - **Referral Fees: Payments or benefits from third parties for introducing clients.**
 - **Gifts & Inducements: Receiving or offering non-cash incentives, hospitality, or sponsorships.**
 - **Preferential Agreements: Biased placement of business with certain suppliers due to benefits received.**
 - **Personal Interests: Employee interests conflicting with client recommendations.**
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6. Policy Principles

- 1. Avoidance – The Company will avoid entering into arrangements that create unmanaged conflicts.**
 - 2. Disclosure – Where conflicts cannot be avoided, full disclosure will be made to clients in writing.**
 - 3. Mitigation – Conflicts will be managed through monitoring, restricted practices, and internal controls.**
 - 4. Transparency – All remuneration, commission, and fees are disclosed in line with FAIS requirements.**
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7. Management of Conflicts

7.1 Identification

- **Employees must disclose potential COIs immediately to their line manager or the Compliance Officer.**
- **An annual Conflict of Interest Declaration Form must be completed by all staff.**

7.2 Gifts and Benefits

- **All gifts, hospitality, and benefits received above R500 must be declared in the COI Register.**
- **No cash gifts may be accepted under any circumstances.**

- **Non-cash incentives (e.g., product supplier training events, trips, sponsorships) are subject to prior approval by a Key Individual.**

7.3 Disclosure to Clients

- **Where an unavoidable COI exists, clients will be informed in writing before any financial service is rendered.**
- **The disclosure will include the nature of the conflict, financial or ownership interests, and steps taken to mitigate risks.**

7.4 Remuneration

- **Representatives may only receive remuneration permitted under the FAIS Act.**
 - **Referral fees or other third-party payments must be authorised by management and disclosed to clients.**
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8. Record-Keeping

- **A Conflict of Interest Register will be maintained by the Compliance Officer.**
 - **All declared gifts, conflicts, and mitigation measures will be recorded.**
 - **Records are retained for at least 5 years for FSCA inspection.**
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9. Training and Awareness

- **All employees receive training on this policy during induction.**
 - **Annual refresher training is provided to ensure awareness of COI risks and obligations.**
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10. Monitoring and Reporting

- **The Compliance Officer monitors adherence to this policy.**
 - **Quarterly reports are submitted to the Board highlighting any material conflicts and actions taken.**
 - **Breaches are reported immediately to management and corrective action is implemented.**
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11. Roles and Responsibilities

- **Board of Directors / Key Individuals: Overall accountability for COI governance.**
- **Compliance Officer: Maintains the COI Register, monitors compliance, and provides assurance.**
- **Employees & Representatives: Must avoid, disclose, and assist in managing conflicts.**

12. Review of Policy

This policy is reviewed annually or when regulatory or business changes occur.

13. Approval

Approved by the Board of Camelot Wealth (Pty) Ltd.

Signed:

A handwritten signature in black ink, appearing to read 'Stacey', is written over a horizontal line. The signature is cursive and somewhat stylized.

Director / Key Individual

Date: 20/02/2025
