

CONFLICT OF INTEREST POLICY

CONFLICT OF INTEREST MANAGEMENT POLICY PLATINUM LIFE FSP 5394

This Conflict of Interest Management Policy has been drafted in accordance with the requirements of Board Notice 58 of 2010 which amends the General Code of Conduct for Financial Services Providers.

1. WHAT IS CONSIDERED TO BE A CONFLICT OF INTEREST?

In terms of the General Code of Conduct as amended, a conflict of interest may occur when a Financial Services Provider (FSP) does not act objectively, does not render an unbiased or fair service or does not act in the client's interest when rendering a financial service to a client. This may happen when the FSP has an actual or potential financial or ownership interest in the client's affairs or has a relationship with a third party or product supplier.

2. POLICY STATEMENT

The directors, shareholders, managers and employees of Platinum Life fully understand the provisions of the General Code of Conduct as amended by Board Notice 58 of 2010 and commit themselves to comply with the provisions. The company will at all times avoid, or where this is not possible, mitigate any conflict of interest that may arise.

3. CONFLICT OF INTEREST DISCLOSURE

Platinum Life has business relationships with other entities that are licensed Financial Services Providers:

- UDM International, FSP 38488
- Channel Life Limited, FSP 19243

Platinum Life's relationships with the above mentioned FSP's are based on accepted industry agreements.

- Guardrisk Life, FSP 76
- Momentum Ability
- Both subsidiaries of MMI Group Limited, FSP 6406.

Platinum Life holds cell captive agreements with the above that include profit-share components.

4. AREAS OF CONFLICT OF INTEREST OR POTENTIAL CONFLICT OF INTEREST

4.1. General

The receipt of cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship or any other valuable consideration shall be deemed to be a financial interest.

Where the amount of this interest does not exceed R1,000 in aggregate per annum to the FSP, including all its representatives and key individuals, it shall be considered an immaterial financial interest.

4.2. Specific

In accordance with section 3A(1)(b) of the General Code of Conduct, Platinum Life confirms that it, or its representatives will only offer or receive financial interest to or from a third party in the form of -

- Commission authorised under the Long Term Insurance Act, 52 of 1998;
- Fees for rendering of a financial service in respect of which commission is not paid, if such fees are specifically agreed to by a client in writing and may be stopped at the client's discretion;

- Fees or remuneration for the rendering of a service to a third party, which fees are reasonably commensurate to the service being rendered;
- Subject to any other law, an immaterial financial interest.

4.3. Personal interest

In accordance with section 3A(1)(b) of the General Code of Conduct, Platinum Life confirms that it will not offer any financial interest to its key individuals or representatives for:

- Giving preference to the quantity of business secured for Platinum Life, from any other Financial Services Provider.
- Giving preference to a specific product supplier, with whom it holds a mandate.
- Platinum Life discourages involvement of its staff in any paid employment outside the company.
- Any activities of staff aimed at generating profit or income outside of the company must be applied for and approved by Platinum Life, in writing in advance.
- No employee of Platinum Life is allowed to accept any gift or valuable consideration from a third party for his or her business activities without adherence to the following:
 - o The value of any gift or valuable consideration shall be deemed to be the fair market value thereof.
 - o Gifts or valuable consideration received from a third party in one (1) calendar year may be accepted if the sum value thereof is less than R1,000. Such gifts or valuable consideration must be entered into the gift register held by Platinum Life's Compliance Administrator.
 - o It is company policy that an employee shall not accept in one (1) calendar year gifts or valuable consideration from a third party if the sum value thereof is greater than R 1,000 unless prior approval is obtained from a Director of Platinum Life and unless the marginal monetary value in excess of R 1,000 is paid by the recipient of the gift, in person, to the third party that gave the gift or valuable consideration. Such gifts or valuable consideration must also be entered into the gift register held by Platinum Life's Compliance Administrator.

5. INTERNAL PROCEDURES

To ensure compliance with this Conflict of Interest Management Policy, Platinum Life has set up the following internal procedures:

- All key individuals, representatives, employees and others are required to read Board Notice 58 of 2010 as well as this Conflict of Interest Management Policy and to sign a statement to the effect that they have done so and fully understand the provisions of both documents and the application thereof.
- Training of this Conflict of Interest Management Policy will be provided to representatives by the company's Compliance Officer either as part of general FAIS training or specifically.
- Key Individuals will conduct ad hoc checks on business transactions to ensure this Conflict of Interest Management Policy has been complied with.
- The Compliance Officer will report this Conflict of Interest in the annual compliance report.
- Avoidance, limitation or circumvention of this Conflict of Interest Management Policy via an associate will be deemed non-compliance.
- Any key individual, representative, employee or other shall be required to report to the Compliance department, alternatively to the Company's Compliance Officer, any potential conflict of interest as soon as reasonably possible after becoming aware of such conflict of interest.
- Non-compliance will be subject to disciplinary procedures in terms of FAIS and employment conditions and can ultimately result in debarment or dismissal as applicable.
- In the event that Platinum Life recognise the existence of a material conflict of interest, it shall notify affected clients thereof as soon as reasonably possible and shall immediately take steps to avoid such conflict of interest.
- Should however, a conflict of interest arise which cannot be avoided, Platinum Life shall immediately disclose in writing, the nature and extend of such conflict of interest and any possible steps that may be taken to mitigate the conflict, and where applicable, afford the affected client/s the opportunity of reviewing their decision to use or continue to use its services.