



Policy and Procedure Manual

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CONFLICTS OF INTEREST

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Scope

The General Code of Conduct for Authorised Financial Services Providers and Representatives ("**the Code**") issued under the Financial Advisory and Intermediary Services Act, 2000 (Act No. 37 of 2002) ("**FAIS**"), requires financial service providers to have a Conflict of Interest Management Policy in place to ensure that conflicts of interest are managed appropriately in the business.

Purpose

The purpose of this policy is to assist all subsidiary companies of Efficient Group Ltd, who are licensed Financial Services Providers (FSP'S) as provided for in FAIS, and their employees, to identify potential and actual conflicts of interest and to manage it appropriately.

This policy accordingly provides for separate Conflict of Interest Policy statements issued in respect of each licensed FSP within the Group.