KCW Wealth: Conflict of Interest Management Policy

1. Purpose

KCW Wealth (Pty) Ltd is committed to identifying, avoiding, managing and disclosing conflicts of interest in order to ensure that financial services are rendered honestly, fairly, with due skill, care and diligence, and in the best interests of clients.

This policy is made publicly available in line with the requirements of the Financial Advisory and Intermediary Services Act (FAIS) and Board Notice 58 of 2010.

2. Scope

This policy applies to:

- Directors
- Key Individuals
- Representatives
- Relevant support staff
- Any person acting on behalf of KCW Wealth

3. What is a Conflict of Interest

A conflict of interest occurs where a person's interests, relationships or activities may influence, or be perceived to influence, the objective performance of their duties.

Conflicts may be:

- Actual
- Potential
- Perceived

4. Types of Conflicts

Conflicts of interest may arise from, but are not limited to:

- Financial interests
- Ownership interests
- Gifts, incentives or rewards
- Outside business interests
- Personal or family relationships

5. Identification and Disclosure

KCW Wealth requires that:

- All conflicts of interest are identified upfront
- Conflicts are disclosed to clients where required
- Conflicts are recorded and managed appropriately

Where a conflict cannot be adequately managed, KCW Wealth will avoid the activity or transaction.

6. Management and Mitigation of Conflicts

KCW Wealth manages conflicts of interest through appropriate measures, which may include:

- Written disclosure to clients
- Restricting or prohibiting certain activities
- Removing individuals from decision-making processes
- Declining or terminating business relationships where necessary

7. Gifts and Incentives

KCW Wealth maintains controls over gifts and incentives to prevent inappropriate influence on advice or intermediary services.

Any gifts or incentives must comply with FAIS requirements and internal controls.

8. Record Keeping

KCW Wealth maintains internal records of:

- Conflict of interest declarations
- Identified conflicts and mitigation actions

These records are retained in accordance with FAIS requirements and are not publicly disclosed.

9. Governance and Oversight

Key Individuals are responsible for:

- Reviewing conflict of interest declarations
- Monitoring compliance with this policy
- Ensuring appropriate action is taken where conflicts arise

10. Review of the Policy

This policy is reviewed annually or when material changes occur to ensure ongoing compliance with FAIS requirements.

11. Contact Details

Clients may request further information regarding this policy by contacting:

KCW Wealth (Pty) Ltd Email: admin@kcwgroup.co.za

Effective Date

This policy is effective from the date of approval and remains in force until replaced or amended.