

Conflict of Interest Management Policy – UDM 38488

1. Purpose

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. The purpose of this policy is to ensure that all employees and representatives of UDM International act in the best interests of our clients and manage any conflicts of interest that may arise.

2. Scope

This policy applies to all directors, shareholders, managers and employees of UDM International.

3. Definition of 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.
- 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.

4. Policy Statement

The directors, shareholders, managers, and employees of UDM International adhere to the provisions of the General Code of Conduct as amended by Board Notice 58 of 2010.

The company will at all times avoid or, where this is not possible, mitigate any conflict of interest that may arise.

By way of our disclosure notices, the company discloses all business relationships. This is also included in all our sales scripts.

5. Conflict of Interest Disclosure

UDM International is a Financial Services Provider offering intermediary services for our clients

UDM International has business relationships with the following entities that are licensed Financial Services Providers:

- Platinum Life FSP 5394
- Capital Legacy FSP 43826

6. Financial Interest

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

Where the determinable monetary value received from a third party does not exceed R1,000 per annum, the valuable consideration received shall be considered an immaterial financial interest.

In accordance with section 3A(1)(a) of the General Code of Conduct UDM International only receives financial interest from third parties in the form of:

- Commission that does not exceed that which is authorised under the Long-term Insurance Act (Act 52 of 1998);
- Fees for the rendering of binder and outsourced services on behalf of the third party, which are reasonably commensurate to the services being rendered and which do not exceed statutory limitations.

In accordance with section 3A(1)(b) of the General Code of Conduct, UDM International does not offer any financial interest to its representatives for:

- Giving preference to the quantity of business secured to the exclusion of the quality of service rendered to its clients.

7. Managing and Mitigating Conflicts of Interest

To manage and mitigate conflicts of interest, UDM International will implement the following measures:

- **Training:** training is provided to all employees and representatives on identifying, disclosing, and managing conflicts of interest.
- **Monitoring:** Ongoing monitoring and audits is conducted to ensure compliance with this policy.

8. Internal Procedures

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

- No employee of UDM International shall accept a financial interest, or immaterial financial interest, from a third party without adherence to the following:
 - The value of any gift or valuable consideration shall be the fair market value thereof.

- All gifts or valuable consideration received shall be declared by email to the company's Senior QA Manager Kelleigh Maybery, kelleighm@udm.co.za, who shall update the company gift register accordingly.
- All employees are required to read this Conflict of Interest Management Policy and to sign a statement to the effect that they have done so and understand the provisions thereof.
- UDM International 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 disclosed and approved by management.

9. Responsibilities

- **Employees and Representatives:** Must adhere to this policy, disclose any conflicts of interest, and act in the best interests of clients.
- **Management:** Responsible for implementing this policy, providing training, and ensuring compliance through regular monitoring and audits.

10. Non-Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

11. Review of Policy

This policy will be reviewed annually to ensure its effectiveness and compliance with relevant laws and regulations.