

Etana FAIS Conflict of Interest (COI) Management Policy

Applicable to the Etana Insurance Company Ltd - FSP 16401

1. Statutory definitions Of COI

“**associate**” means in the case of a company, “any subsidiary or holding company of that company, and any other subsidiary of that holding company and any other company of which that holding company is a subsidiary.”

“**conflict of interest**” means any situation in which a provider or a representative has an actual or potential interest that may, in rendering a financial service to a client, -

- (a) influence the objective performance of his, her or its obligations to that client; or
- (b) prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the best interests of that client,

Including, but not limited to –

- (i) a financial interest;
- (ii) an ownership interest;
- (iii) any relationship with a third party.

“**FAIS**” means the Financial Advisory and Intermediary Services Act, No. 37 of 2002.

“**financial interest**” means any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration, other than -

- (a) an ownership interest;
- (b) training, that is not exclusively available to a selected group of providers or representatives, on -
 - (i) products and legal matters relating to those products;
 - (ii) general financial and industry information;
 - (iii) specialised technological systems of a third party necessary for the rendering of a financial service; but excluding travel and accommodation associated with that training.

“**financial service**” means the furnishing of advice and / or the rendering of any intermediary service.

“**immaterial financial interest**” means any financial interest with a determinable monetary value, the aggregate of which does not exceed R 1 000 in any calendar year from the same third party.

“**ownership Interest**” means

- (a) any equity or proprietary interest, for which fair value was paid by the owner at the time of acquisition, other than equity or an proprietary interest held as an approved nominee on behalf of another person; and
- (b) includes any dividend, profit share or similar benefit derived from that equity or ownership interest.

Etana FAIS Conflict of Interest (COI) Management Policy

“**provider**” means an authorised Financial Services Provider registered as such with the Financial Services Board.

“**third party**” means - any product supplier, another provider, an associate of a product supplier or a provider, a distribution channel and any other person who in terms of an agreement provides a financial interest to a provider or its representatives.

2. Policy statement

Etana Insurance Company Ltd is committed to complying with the regulatory requirements governing Conflicts of Interest under the FAIS General Code of Conduct and ensuring that conflicts of interest are appropriately managed in the best interests of our partners, brokers, employees and policyholders.

3. The management of COI

3.1. Mechanisms for the identification of COI

Before we conclude new business arrangements we shall consider whether the proposed arrangement will present any potential conflict of interest. It will be the responsibility of the Business Unit Head entering into the relationship on behalf of Etana to ensure that this identification process is carried out and appropriately documented before the relationship is progressed.

Business Unit Heads will be accountable to ensure that the necessary reviews of all existing business arrangements are conducted at least annually to assess the ongoing conflict of interest in the light of changing circumstances, operational processes and procedures that may have been implemented since the commencement of the business.

3.2. Measures for the avoidance and mitigation of identified COI

Whenever any potential conflict of interest is identified, the Business Unit responsible for the relationship will consider whether any practical means exist for avoiding such conflict of interest. Where this is not practical, the Business Unit Head will consult with the Compliance team to devise appropriate and adequate measures to mitigate and manage the identified conflict of interest.

The resulting mitigating and managing measures will be documented and communicated to all staff involved in managing the relationship to ensure that the risk of the identified conflict of interest is appropriately managed by the affected business unit.

3.3. Measures for the disclosure of COI

Wherever potential conflict of interest is identified, the Business Unit Head will ensure that appropriate communication regarding the following aspects is included in the disclosure information and documentation provided to potential customers purchasing products:

- The existence of the conflict of interest;
- A description of what the conflict is;
- Its impact;
- The measures taken to mitigate and manage it; and
- The customer’s free choice whether he wishes to continue with purchasing the product.

Etana FAIS Conflict of Interest (COI) Management Policy

3.4. Processes, procedures and internal controls to facilitate compliance

Business Unit Heads will be required to ensure that the policy is implemented in their business units and will on an annual basis warrant to the Compliance Department in writing that they have met their obligations under this policy and describe the steps taken to do so.

Training for all affected staff will be provided by the Company to ensure that they understand their responsibilities under this policy.

The Compliance team will monitor compliance with this Conflict of Interest Management policy and will perform the necessary reviews in consultation with Executive Management to ensure that appropriate procedures and processes are in place and effective to comply with the policy.

The Compliance team will facilitate a review of this policy annually to ensure that it remains relevant and appropriate to meet the statutory requirements.

4. Financial interests offered to Etana representatives

Etana may offer its representatives sales incentives, in addition to their basic salary, based upon a combination of:

- The quantity of business introduced;
- The quality of the service rendered to brokers; and
- The loss ratio of business introduced.

Etana's representatives are not authorised to sell, and may not accept remuneration for selling, the products of other product suppliers.

5. Financial interests offered by Etana to Third Parties

Etana may only offer the following financial interests to third parties:

- Commission authorised under the Short Term Insurance Act;
- fees that are reasonably in line with the service being rendered and authorised under the Short Term Insurance Act;
- fees for the rendering of a financial service in respect of which commission or fees referred to above is not paid, if those fees -
 - (aa) are specifically agreed to by a client in writing; and
 - (bb) may be stopped at the discretion of that client;
- fees or remuneration for the rendering of a service to a third party, which fees or remuneration are reasonably in line with the service being rendered;
- any immaterial financial interest as defined in the FAIS General Code of Conduct; and
- any other financial interest, for which consideration that is reasonably in line with the value of the financial interest, is paid by that provider or representative at the time of receipt thereof.

Etana FAIS Conflict of Interest (COI) Management Policy

6. List of Etana Associates

The following entities are associates of Etana Insurance:

- Etana Holdings (Pty) Ltd; and
- High Growth Investments (Pty) Ltd

7. Third parties ¹in which Etana holds an ownership interest

Etana Insurance does not hold any ownership interest in any third party.

8. Third parties who hold an ownership interest in Etana

No third party holds an ownership interest in Etana Insurance.

9. Consequence of non-compliance with this policy

Failure to comply with the provisions of this policy by any staff member or FAIS representative shall constitute serious misconduct and will result in disciplinary action being initiated against such staff member or representative.

¹ As defined in the FAIS General Code of Conduct



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