



Internal Policy on Conflict of Interest and Register of non-cash incentives

FSP: Duwalcoe (PTY) LTD
FSB License No: 49748
Key Individual(s): Duan Dekker, Hannes Nel

Objective

In accordance with a financial services provider's obligation to act in the best interest of his or her client, it is not permissible for a financial services provider to engage in conduct, whether by acting or failing to act, which would amount to a conflict of interest with that of the client.

The primary objectives of this policy are:

- To provide guidance on the behaviors expected in accordance with the Code of Conduct.
- To promote transparency and avoid conflicts of interest.
- To ensure fairness in the interests of clients.
- To document the process for the disclosure of information, which may amount to actual, potential or perceived conflicts of interest.

Process and Requirements

Whenever the FSP renders a financial service, it must disclose to clients the existence of any personal interest in the relevant service, or of any circumstance which gives rise to an actual or potential conflict of interest in relation to such service, and take all reasonable steps to ensure fair treatment of the client.

Non-cash incentives offered and/or other indirect consideration payable by another provider, a product supplier or any other person to the FSP, could be viewed as a potential conflict of interest.



Disclosure will take the form of a specific disclosure of any personal interest in a specific service, as well as a general disclosure regarding non-cash incentives in the FSP's Contact Stage Disclosure letter, as well as the maintenance of a Register of Non-Cash Incentives.

The details of any non-cash incentives offered and / or other indirect consideration paid to the FSP by any other FSP, a product supplier or any other person will be recorded in the non-cash incentives register. The register will be available on the premises should a client wish to obtain further details.

Personal Interest includes:

- An instance where the FSP sells the product of a smaller product provider company in which the FSP has a financial interest- for example, is a shareholder in the company.
- Instances where the interest is other than a reasonable amount of commission,
- Instances where the FSP partakes in some sort of profit share with the product provider company.

Non-cash incentives include:

- offshore trips, seminars, holidays or other substantial gifts offered where there is an expectation to do, give or provide something in return for the product provider;
- prizes or incentives offered to the FSP to reach a certain sales target for a specific product;
- special commission rate given to the FSP if the FSP sell's a certain product;
- Small gifts such as lunches, golf days, rugby tickets, promotional will also be recorded in the register of non-cash incentives.

Fair Treatment of the Client:

At all times the FSP must be able to show that where there were similar products that may have been suitable with similar benefits, that the product recommended would have been recommended regardless of the incentive offered to the FSP.



DUWALCOE
(PTY) LTD

P O Box 1462
Linkhills 3652

FSP No: 49748
An Authorised Financial
Services Provider

Register of non-cash incentives / Gifts

Name of FSP : Duwalcoe PTY Ltd

FSB License Number : 49748

Responsible Individual managing register : Hannes Nel

Date received	From whom	Description	Reason	Comments



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(PTY) LTD

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Services Provider

T: 031 763 5200 | **E:** shortterm@duwalcoe.co.za | **W:** www.duwalcoe.co.za
F: 031 763 4095 | Directors: DW Dekker, WD Dekker | CK 2018/225355/07