



Elysian Wealth Partners (PTY) LTD

Conflict Of Interest Management Policy

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Table of Contents

Introduction.....	2
Purpose	2
Definitions:	2
Procedures:.....	3
How to identify COI:	4
Key Indicators of a Conflict of Interest	4
Proactive Identification Measures	5
Resolving COI or potential COI:	6
1. Principle	6
2. Steps for Resolution.....	6
3. Accountability & Consequences	7
4. Policy Review	7
1. Financial Interests.....	7
2. Outside Business Activities	7
3. Personal Relationships	8
4. Client vs. Firm Incentives.....	8
5. Gifts & Hospitality	8
6. Information Misuse	8
7. Dual Roles & Conflicting Duties	8
8. Referral Arrangements	8
9. Corporate Opportunities.....	8
10. Recruitment & Staffing.....	8
Pension Funds.....	9
Disclosure of COI:.....	9
Housekeeping of this document:.....	10
List of all Elysian Wealth Partners (PTY) LTD associates:	10
Names of any third parties in which the Company hold an ownership interest: ...	10
Names of any third parties that holds an ownership interest in the Company:	11
List nature and extent of ownership interest referred to in point 7 and 8.	11
Conclusion:	11
Annexure A- Accepted financial interest as amended.....	11
Annexure B – Gift register.....	12

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1. Introduction

This policy outlines a suitable, effective and sustainable approach to the identification and management of conflicts of interest ("COI").

The policy aims to comply with the best practice and statutory requirements as per the General Code of Conduct for Financial Services Providers and Representatives published in Board Notice 80 of 2003 as amended by Board Notice 58 of 2010 as well as other applicable requirements as set out in the Financial Advisory and Intermediary Services Act, 37 of 2002 ("FAIS").

2. Purpose

Outline the purpose of the COI policy.

Example:

This document embodies the Conflict-of-Interest Management Policy for Elysian Wealth Partners (PTY) LTD.

The purpose of this policy is:

- 1. to provide guidance on the behaviours expected in accordance with Elysian Wealth Partners (PTY) LTD standards.*
- 2. to promote transparency and to avoid or mitigate any business-related COI that may arise between Elysian Wealth Partners (PTY) LTD, its clients, vendors and/or employees respectively.*
- 3. to ensure fairness in the interests of employees and Elysian Wealth Partners (PTY) LTD.*
- 4. to document the process for the disclosure, approval and review of activities that may amount to actual, potential or perceived COI;*
- 5. to provide a mechanism for the objective review of personal outside interests.*

Elysian Wealth Partners (PTY) LTD is committed to ensuring that all business is conducted in accordance with good business practice. To this end Elysian Wealth Partners (PTY) LTD conducts business in an ethical and equitable manner and in a way, that safeguards the interests of all stakeholders to minimize and manage all real or potential conflict of interest ("COI"). Elysian Wealth Partners (PTY) LTD and its representative must therefore avoid (or mitigate where avoidance is not possible) any COI between Elysian Wealth Partners (PTY) LTD and a client or its representative and a client.

6. Definitions:

For purposes of this policy, the following words and/or phrases are defined herein:

"Conflict of interest" means any situation in which Elysian Wealth Partners (PTY) LTD or its representatives has an actual or potential interest that may, in rendering a financial service to a client influence the objective performance of his, her or its obligations to that client; or prevent Elysian Wealth Partners (PTY) LTD or its representatives from rendering an unbiased

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and fair financial service to that client, or from acting in the interests of that client, including, but not limited to

1. *a financial interest.*
2. *an ownership interest.*
3. *any relationship with a third party ("third party") means*
 1. *a product supplier,*
 2. *another provider,*
 3. *an associate of a product supplier or a provider.*
 4. *a distribution channel.*
 5. *any person who in terms of an agreement or arrangement with a person referred to in paragraphs (a) to (d) above provides a financial interest to a provider or its representatives.)*

"FAIS" means the Financial Advisory and Intermediary Services Act, 37 of 2002.

"Financial interest" means any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic and foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration, other than –

1. *an ownership interest*
2. *training, that is not exclusively available to a selected group of providers or representatives on products and legal matters relating to those products; general financial and industry information; specialized technological systems of a third party necessary for the rendering of a financial service; but excluding travel and accommodation associated with that training.*

"Immaterial financial interest" means any financial interest with a determinable monetary value, the aggregate of which does not exceed R1 000 in any calendar year from the same third party in that calendar year received by –

1. *a provider who is a sole proprietor; or*
2. *a representative for that representative's direct benefit.*
3. *a provider, who for its benefit or that of some or all of its representatives, aggregates the immaterial financial interest paid to its representatives.*

"Representative" means duly appointed representative and/or representative under supervision of Elysian Wealth Partners (PTY) LTD.

"Ownership interest" means

1. *any equity or proprietary interest, for which at 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*
2. *includes any dividend, profit share or similar benefit derived from that equity or ownership interest.*

"Provider" means Elysian Wealth Partners (PTY) LTD

3. Procedures:

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Elysian Wealth Partners (PTY) LTD or its representatives may only receive or offer financial interest from or to a third party as determined by the Commissioner of Financial Services Providers from time to time, and as set out in Annexure A hereto.

Elysian Wealth Partners (PTY) LTD may not offer any financial interest to its representatives for giving preference to the quantity of business secured for the provider to the exclusion of the quality of the service rendered to clients; or giving preference to a specific product supplier, where a representative may recommend more than one product supplier to a client; or giving preference to a specific product of a product supplier, where a representative may recommend more than one product supplier to a client.

4. How to identify COI:

To maintain transparency and integrity, all employees, representatives, and key individuals must be vigilant in identifying potential conflicts of interest. A COI may arise when personal, financial, or external interests interfere—or appear to interfere—with professional duties to clients or the firm.

Key Indicators of a Conflict of Interest

1. Financial Interests

- 1.1. Holding direct or indirect financial stakes (e.g., shares, investments, or loans) in a client, supplier, competitor, or third party related to a transaction.
- 1.2. Receiving commissions, gifts, or benefits that could influence decision-making.

2. Outside Employment or Business Activities

- 2.1. Engaging in secondary employment, directorships, or advisory roles with entities that compete with or supply services to Elysian Wealth Partners.
- 2.2. Running a private business that overlaps with the firm's interests.

3. Personal Relationships

- 3.1. Family members, close friends, or associates employed by or doing business with clients, competitors, or service providers.
- 3.2. Favoritism in awarding contracts or opportunities to connected parties.

4. Confidential Information Misuse

- 4.1. Using insider knowledge (e.g., client data, investment strategies) for personal gain or to benefit a third party.

5. Client vs. Firm Interests

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5.1. Recommending products or services that prioritize the firm's revenue (e.g., higher-fee options) over the client's best interest.

5.2. Divergence between fiduciary duty and personal incentives.

6. Gifts or Entertainment

6.1. Accepting excessive hospitality, gifts, or favors that could create a sense of obligation.

7. Conflicting Roles

7.1. Serving simultaneously in roles that create divided loyalties (e.g., acting as both advisor and beneficiary in a transaction).

Proactive Identification Measures

- i. **Self-Assessment:** Regularly evaluate personal and professional engagements for red flags.
- ii. **Checklists:** Use firm-provided COI questionnaires during onboarding, annual reviews, or before new engagements.
- iii. **Scenario Training:** Participate in workshops to recognize COI risks in real-world situations.
- iv. **Open Dialogue:** Report ambiguities to the Compliance Officer for clarification.

Example: An advisor whose spouse works for a fund manager recommended by Elysian must disclose this relationship.

For example:

In order to identify whether you have a conflict of interest, a representative should ask the following questions:

1. *Do I have my client's best interest at heart, or am I acting in my own best interest?*
2. *Do I have Elysian Wealth Partners (PTY) LTD's best interest at heart, or am I acting in my own best interest?*
3. *Am I acting professionally?*
4. *Am I acting independently?*
5. *Am I acting objectively?*
6. *Are my interests aligned with that of Elysian Wealth Partners (PTY) LTD*

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7. **Resolving COI or potential COI:**

Key individuals and representatives of Elysian Wealth Partners (PTY) LTD are expected to avoid all COI or potential COI. Where not possible, mitigate and disclose.

1. Principle

Key individuals and representatives of Elysian Wealth Partners (Pty) Ltd must **avoid all conflicts of interest (COI) or potential COI** in the course of their duties. Where avoidance is not possible, they must **promptly mitigate and disclose** the conflict in accordance with this policy.

2. Steps for Resolution

When a COI or potential COI arises, the following process must be followed:

A. Avoidance (Primary Obligation)

1. All employees, directors, and representatives must proactively structure their professional and personal engagements to prevent conflicts.
2. This includes refraining from activities, investments, or relationships that could compromise impartiality or create divided loyalties.

B. Disclosure (Where Avoidance is Not Possible)

1. If a COI or potential COI is unavoidable, the individual must **immediately disclose** it in writing to the **Compliance Officer** or senior management.
2. Disclosure must include:
 - a. Nature of the conflict.
 - b. Parties involved.
 - c. Potential impact on clients, the firm, or stakeholders.

C. Mitigation & Management

Upon disclosure, Elysian Wealth Partners will assess the conflict and implement appropriate measures, which may include:

- i. **Independent Review:** Assigning an unbiased party to oversee the matter.
- ii. **Informed Client Consent:** Providing full transparency to affected clients and obtaining their written consent where applicable.

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- iii. **Restricted Involvement:** Limiting the conflicted individual's role in relevant decisions or transactions.
- iv. **Recusal:** Requiring the individual to abstain from participation in discussions or votes related to the conflict.

D. Escalation & Documentation

- 1. Significant or unresolved conflicts must be escalated to the **Board/Compliance Committee**.
- 2. All disclosures, assessments, and actions taken must be **documented** and retained for regulatory compliance.

3. Accountability & Consequences

- a) Failure to disclose or manage a COI may result in disciplinary action, including termination.
- b) Regular training will reinforce adherence to this policy.

4. Policy Review

This policy will be reviewed annually to ensure alignment with legal standards and best practices.

- 1. Potential COI that could affect Elysian Wealth Partners (PTY) LTD

The following are potential COI that could affect Elysian Wealth Partners (PTY) LTD:

1. Financial Interests

- Personal investments in client companies, competitors, or recommended products
- Receiving commissions, referral fees, or incentives from third-party providers

2. Outside Business Activities

- Secondary employment or directorships with competitors, suppliers, or related entities
- Private business interests that overlap with the firm's services

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3. Personal Relationships

- Family members or close associates employed by clients, service providers, or competitors
- Favoritism in client referrals, partnerships, or vendor selection

4. Client vs. Firm Incentives

- Recommending in-house products/services due to higher profitability rather than client suitability
- Prioritizing firm revenue (e.g., fee structures) over client best interests

5. Gifts & Hospitality

- Accepting excessive gifts, entertainment, or benefits from clients or third parties
- Non-monetary incentives that could influence professional judgment

6. Information Misuse

- Using confidential client data for personal gain or unauthorized purposes
- Insider knowledge influencing investment recommendations

7. Dual Roles & Conflicting Duties

- Acting as both advisor and beneficiary in a transaction (e.g., estate planning)
- Serving on boards/committees with competing interests

8. Referral Arrangements

- Undisclosed kickbacks or preferential agreements with external advisors/platforms
- Biased recommendations due to referral partnerships

9. Corporate Opportunities

- Diverting business opportunities (e.g., investments, acquisitions) to personal ventures
- Exploiting firm resources for private gain

10. Recruitment & Staffing

- Hiring/promoting individuals based on personal relationships rather than merit
- Conflicts arising from close personal ties within the firm

2. Insider trading:

The term “insider trading” describes circumstances where an individual, who has price sensitive information, deals in a related security or financial instrument before the information is made available to the rest of the market.

Insider trading creates conflicts of interest.

The individual is abusing their knowledge and so placing themselves in a better position than the rest of the market, which conflicts with the concept of market fairness. A representative that commits insider trading is additionally placing themselves in a better position than Elysian Wealth Partners (PTY) LTD and/or its clients, so creating a conflict of interests between themselves and Elysian Wealth Partners (PTY) LTD and/or its clients.

8. Pension Funds

In the event where an FSP renders a financial service to a pension fund, the FSP must apply the following stricter limitations in compliance with Directive No 8 of 2018 of the Pension Funds Act, No 24 of 1956 – Prohibition of the acceptance of gratification.

- 1. Any gratification which objectively viewed, creates a conflict of interest with their fiduciary duty towards the funds;*
- 2. Token gift/s that exceed/s the annual limit set by the Board of the Pension Fund in terms of the pension funds’ gift policy, which annual limit shall not be more than R500 per annum in aggregate from any one service provider i.e. FSP;*
- 3. Any gratification relating to local or international due diligence including but not limited to subsistence, travel or accommodation;*
- 4. Any gratification relating to local or international entertainment or sporting events including, but not limited to, subsistence, travel or accommodation; or*
- 5. Conferencing costs or board of fund expenses.*

6. Disclosure of COI:

At the earliest reasonable opportunity, Elysian Wealth Partners (PTY) LTD and its representative must, in writing, disclose to a client any COI or potential COI in respect of that client including –

- 1. Measures taken to avoid or mitigate the conflict;*
- 2. Any ownership interest or financial interest that the provider or representative may be or become eligible for;*
- 3. The nature of the relationship or arrangements with a third party that gives rise to a COI in sufficient detail to enable the client to understand the exact nature of the COI.*

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At the earliest reasonable opportunity, Elysian Wealth Partners (PTY) LTD and its representative must, in writing, inform a client of the Conflict of Interest Management Policy and how it may be accessed.

Notification of an actual or potential COI should be made to a person with responsibility for the issue or area, such as the relevant management team, supervisor, head of the department or key individual.

In accordance with an employee's obligation to act in the best interest of his or her employer, it is not permissible for employees to engage in conduct that would amount to a COI with Elysian Wealth Partners (PTY) LTD.

Staff that fail to disclose a potential or actual COI in accordance with this policy may be liable to disciplinary procedures as governed by relevant industrial awards or agreements.

4. Housekeeping of this document:

1. Ownership and ultimate responsibility:

1. *This document is owned and maintained by Elysian Wealth Partners (PTY) LTD. The ultimate responsibility for this document, the contents thereof and compliance remains with the Key individuals, of Elysian Wealth Partners (PTY) LTD who is responsible for creating an ethical environment.*

2. Updates, review and approval:

1. *Elysian Wealth Partners (PTY) LTD COI policy shall be reviewed on an [insert] basis and updated if necessary. This policy is approved by [insert].*

3. Adoption and implementation:

1. *Every staff member must have a copy of the Conflicts of interest Management Policy. If a potential COI arises, the transaction must first be discussed with management before entering the transaction.*

4. Non-compliance with this document:

1. *Non-compliance with this policy and the procedures described in it may be misconduct and employees may be subject to disciplinary action that may lead to dismissal.*
2. *[insert information relevant to company]*

5. List of all Elysian Wealth Partners (PTY) LTD associates:

1. *FX Backoffice*
2. *LP Prime*

3. Names of any third parties in which the Company hold an ownership interest: *[Not Applicable]*

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4. **Names of any third parties that holds an ownership interest in the Company:**
[Not Applicable]

5. **List nature and extent of ownership interest referred to in point 7 and 8.**
[Not applicable]

6. **Conclusion:**

All representatives of Elysian Wealth Partners (PTY) LTD including key individuals and management are required to be dedicated to upholding the highest level of integrity and ethical conduct in all of their activities and relationships with all stakeholders.

7. **Annexure A- Accepted financial interest as amended**

The Commissioner of Financial Services Providers issued Board Notice 58 of 2010 (BN 58) under section 15 of the Financial Advisory and Intermediary Services Act, 2002 (FAIS). BN 58 amends the General Code of Conduct for Authorised Financial Services Providers and Representatives under FAIS and determines that a financial services provider or its representatives may only receive or offer financial interest from or to a third party as follows:

1. *Commission authorised under the Long-term Insurance Act or Short-term Insurance Act;*
2. *Commission authorised under the Medical Schemes Act;*
3. *Fees authorised under the Long-term Insurance Act, the Short-term Insurance Act or the Medical Schemes Act, if those fees are reasonably commensurate to a service being rendered;*
4. *Fees for the rendering of a financial service in respect of which commission or fees referred to in sub-paragraph (i), (ii) or (iii) is not paid, if those fees –*
 1. *are specifically agreed to by a client in writing; and*
 2. *may be stopped at the discretion of that client.*
3. *fees or remuneration for the rendering of a service to a third party, which fees or remuneration are reasonably commensurate to the service being rendered;*
4. *subject to any other law, an immaterial financial interest*; and*
5. *a financial interest, not referred to under sub-paragraph (i) to (vi), for which a consideration, fair value or remuneration that is reasonably commensurate to the value of the financial interest, is paid by that provider or representative at the time of receipt thereof.*

6. **Annexure B – Gift register**

Name of Key Individual / Representative	Date on which gift was received	Source of gift	Type of gift	Value of gift
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable