Policy Statement: Conflicts of Interest Policy

The Absa Group Limited (hereinafter referred to as “AGL”) confirms that as an organisation it is committed to maintaining high levels of integrity, professionalism and ethical behaviour in all its relationships. Thus, it would endeavour to ensure that existing and potential conflicts of interest are properly and sufficiently managed where they cannot altogether avoided.

The AGL Board approved a conflicts of interest policy, which puts guidelines in place to manage Conflicts of Interests. This Policy is available for public inspection during normal business hours as required in terms of section 3A(2)(f) of the Financial Advisory and Intermediary Services Act, No. 37 of 2002 (FAIS) General Code of Conduct.

The objective of the conflicts of interest policy is to provide a framework with regard to the avoidance and management of conflicts of interest in the organisation to:

- Achieve compliance with local and international regulatory requirements.
- Avoid legal liability and reputation risk arising from conflicts of interest.
- Protect the confidentiality of client information and, by so doing, maintain confidence in the financial markets; and
- The policy applies throughout the organisation.

Controls and processes have been adopted to manage or avoid conflicts of interest, including, inter alia:

- The implementation of appropriate procedures to identify all conflicts of interest, actual or perceived that arise or may arise;
- The management of conflicts of interest by implementing appropriate measures such as information barriers and separation of functions that consider and protect the interests of all parties;
- The maintenance and operation of effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interests from giving rise to a material risk of damage to the interests of its clients; and,
- The disclosure of the nature of a conflict to a client before undertaking business for the client in instances where the measures to manage conflicts are considered insufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented.

Associated business unit processes and procedures have been put in place to comply with specific legal obligations such as the Conflicts of Interest Requirements contained in the FAIS General Code of Conduct.

Independent testing for compliance with the Conflicts of Interest requirements are performed through periodic reviews performed by the AGL Compliance Department.

Charles Wheeler
Acting Head of Compliance