



Franco Bottari & Associates cc

Specialist Short Term Insurance Brokers

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ANNEXURE 2

POLICY NAME	Conflict of Interest Management Policy
INCEPTION DATE	1 January 2013
REVISION DATE	25 July 2013

PURPOSE	<p>The General Code of Conduct for Financial Services Providers requires financial services providers and their representatives (employees) to disclose to their clients the existence of actual or potential conflicts of interest.</p> <p>This policies serves to define what constitutes a conflict of interest; what transparency and disclosure is required to avoid or address an actual or potential conflict of interest; and to ensure that Franco Bottari & Associates (the company) and its employees treat their clients fairly and act in the clients' best interests at all times.</p>
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POLICY	<ul style="list-style-type: none">• Conflict of interest refers to a situation where an employee of Franco Bottari & Associates (the company) has an actual or potential interest that may influence the objective exercising of obligations to our client. It also refers to a situation that might prevent an employee from rendering financial services in an unbiased and fair manner. It is important to note that a conflict of interest implies only the potential for bias, not the likelihood.• Franco Bottari & Associates and its employees strive to avoid situations that may give rise to a conflict of interest; and to mitigate any such situations as soon as possible.• At Franco Bottari & Associates product sales are not linked to incentives, monetary or other rewards. The company does not offer any financial or other interest to employees for giving preference to a specific product or product supplier, where an employee may recommend more than one product or more than one product supplier to a client. The company also does not reward employees for giving preference to the quantity of business secured for the company to the exclusion of the quality of the service rendered to clients.
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	<ul style="list-style-type: none"> • No employees are allowed to accept rewards, gifts, incentives; monetary or otherwise from any of our suppliers (namely, Insurance Companies) or from providers of products or service which may be required by our clients (eg. windscreen repair companies, panel beaters). The reason for this policy is that the employee may be influenced by these gifts, incentives, rewards; without due care to the client and the client's needs, to the detriment of the client. • As a brokerage it is our duty to advise our clients of the suitable products and services available; and make suggestions for what we believe best suits their needs. The service we render is in accordance with the contractual relationship we have with our clients and is done so with due regard for the interests of the client which is afforded appropriate priority over the interests of the company. • Franco Bottari & Associates strives at all times to safeguard our clients' interests and to treat our clients fairly and with complete transparency. • All employees must disclose to the client and the main member of the company (Mr Franco Bottari) any personal interest in the services or products sold or marketed or recommended to our clients; or even the existence of any potential conflict of interest. • All employees must also disclose to our clients and the main member of the company, any circumstance which will give rise to an actual or potential conflict of interest. • Transparency regarding commission assists in avoiding and disclosing possible conflicts of interest. Commission disclosures are included in all client copies of the policy schedules documents and can be found in the Information Disclosure document.
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PROCEDURE	<p>Employees are to immediately advise the Managing Member of any actual or potential conflict of interest in any dealings with clients of the company. The Managing Member will then liaise with the client to inform them of the conflict of interest; this will include notifying the client as soon as possible in writing. Together they will then decide on an appropriate course of action.</p> <p>The employee must note the incident (potential or actual conflict of interest) in the Conflict of Interest register.</p>
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RELATED FORMS OR DOCUMENTS	Conflict of Interests register Policy Training Register
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RELATED LEGISLATION	Financial Advisory and Intermediary Services (FAIS) Act, 2002 Financial Services Board Notice 58 of 2010
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TRAINING REGISTER: CONFLICT OF INTEREST POLICY

Employee Name	Date of Training	Signature
Franco Bottari		
Barbara Booth		
Gia Clarke		
Lara Dickson		
Carmen van Vuuren		

