

# CONFLICT OF INTEREST POLICY



**Lyall Morgan & Associates (Pty) Ltd.**

## LYALL MORGAN & ASSOCIATES (PTY) LTD

**REG NO 1985/004406/07 - FSP NO 7350**

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### **1. INTRODUCTION**

This document details LMA's Conflicts of Interest Management Policy

A short summary of this policy is included in the "Letter of Introduction" document, issued and explained to clients at the beginning of the sales process. The full Management Policy document is also available on request.

This policy applies to all employees of LMA.

### **2. WHAT IS A CONFLICT OF INTEREST AND WHEN MAY IT ARISE?**

A conflict of interest may arise where a company, or one of its employees, is providing a financial service to its clients and may entail a material risk of damage to those clients interests, and whether the company or its employee:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- Has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- Has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of the client;
- Carries on the same business as the client; or
- Receives or will receive from a person other than the client, an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

### **3. HOW WE MANAGE CONFLICTS OF INTEREST**

The following are examples of conflicts of interest and how we manage these conflicts:

#### **Contracts, proposed contracts and similar transactions or arrangements**

A conflict of interest may arise where an employee has a direct, or indirect interest in a transaction. This may be where the employee has a connection with the other party to the transaction, or where the employee's family has a connection. The connection may be from a directorship, significant shareholding, employment or consultancy.

LMA requires disclosure of any connection which could, or could be seen to, have the effect of compromising the judgment of any of our employees. Employees are required to notify

LMA of any such potential conflicts of interest, who will then decide if the employee can be involved in the transaction. LMA will also ensure that the relevant provisions have been met.

### **Gifts, Hospitality & Inducements**

Inducements, gifts and hospitality are all issues that could lead to potential Conflicts of Interest. LMA has a strict policy regarding such issues, which is documented by LMA. All employees must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest.

Employees must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise LMA's integrity. A register is kept of any gifts, or hospitality received.

Employees cannot attend hospitality events, without LMA's approval. Where an invitation could be construed as being a business inducement, it must be declined.

### **4. IN SUMMARY**

LMA expects all its employees to maintain the highest standards in carrying out their business activities, adhering to legislative requirements and our policies on business conduct. LMA expects its employees to act professionally, honestly and ethically in all their dealings with clients, colleagues and third parties. LMA has a clear policy on Conflicts of Interest:

- Conflicts of Interest should always be avoided, wherever possible,
- Conflicts or potential Conflicts of Interest must always be disclosed. LMA will not tolerate non-disclosure by its employees.