



GHT (PTY) LTD — CONFLICT OF INTEREST MANAGEMENT POLICY

1. PLAN INTRODUCTION & REGULATORY CONTEXT

1.1 Introduction

In terms of Section 3A of the General Code of Conduct for Authorised Financial Services Providers and Representatives (FAIS Act), GHT (Pty) Ltd ("GHT") is legally obligated to adopt, maintain, and implement a comprehensive Conflict of Interest Management Policy. GHT is committed to conducting financial services honestly, fairly, and with due skill, care, and diligence, ensuring the integrity of financial markets and protecting client interests at all times.

1.2 Purpose

Establish robust mechanisms to identify, assess, avoid, and mitigate actual or potential conflicts of interest.

Ensure financial services rendered to clients are unbiased, objective, and driven solely by client needs.

Embed the Treating Customers Fairly (TCF) framework into GHT's operational practices, preventing any incentive structure from creating client detriment.

Prescribe clear rules regarding the receipt and offering of financial interests, immaterial financial interests, ownership interests, and associate relationships.

2. DEFINITIONS

2.1 "Associate"

Natural Person: A spouse, life partner, or civil union partner; a child (including stepchild or adopted child); a parent or stepparent; a legal guardian/curator; or a commercial partner.

Juristic Person: Any subsidiary or holding company; closed corporation members; entities whose governing bodies act in accordance with GHT's instructions or vice versa; and any trust controlled or administered by that person.

2.2 "Conflict of Interest"

Any situation in which GHT or its representatives have an actual or potential interest that may, in rendering a financial service to a client:

Influence the objective performance of obligations to that client; or

Prevent GHT or its representatives from rendering unbiased, fair, and objective financial services; or

Prevent GHT or its representatives from acting in the best interests of the client.

A conflict includes, but is not limited to, a financial interest or an ownership interest.

2.3 "Financial Interest"

Any cash, cash equivalent, voucher, gift, service, advantage, benefit, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, or other incentive, excluding:

An ownership interest.

Training (not exclusively available to a select group) on products, legal matters, general financial concepts, or dedicated IT systems necessary to render a financial service (excluding associated travel and accommodation).

2.4 "Immaterial Financial Interest"

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, received by:

A provider who is a sole proprietor; or

A representative for their direct benefit; or

A provider that aggregates immaterial financial interests paid by a third party for its representatives.

2.5 "Ownership Interest"

Any equity or proprietary interest for which fair value was paid at acquisition (excluding approved nominee holdings), including dividends, profit shares, or similar financial benefits derived from such equity.

2.6 "Third Party"

A product supplier, another financial services provider, an associate of a product supplier or provider, a distribution channel, or any party providing a financial interest to a provider or its representatives pursuant to an agreement.

3. PROHIBITED & PERMISSIBLE FINANCIAL INTERESTS

3.1 Prohibited Remuneration Practices

GHT does not offer, directly or indirectly, any financial interest to its representatives for:

Giving preference to the quantity of business secured to the exclusion of the quality of service rendered to clients.

Giving preference to a specific product supplier where multiple suppliers could be recommended.

Giving preference to a specific product of a supplier where other suitable products are available.

3.2 Permissible Financial Interests

GHT and its representatives may only receive or offer the following financial interests:

Statutory Commission: Authorized under the Long-term Insurance Act, Short-term Insurance Act, or related financial services legislation.

Section 8 Fees: Fees authorized under the FAIS Act, provided they are reasonably commensurate with the service rendered and disclosed to the client.

Service-Related Fees: Fees or remuneration for services rendered to a third party or product supplier, provided the fee is market-related and reasonably commensurate to actual services rendered.

Immaterial Financial Interests: Gifts, hospitality, or tokens compliant with the regulatory R1,000 annual aggregate threshold and logged in GHT's Gift Register.

4. IDENTIFICATION MECHANISMS

Quarterly Governance Reviews: The governing body assesses all third-party commercial contracts, underwriting agreements, and ownership structures to ensure no commercial arrangement compromises objective service delivery.

Mandatory Declarations: Key Individuals and Representatives submit signed Conflict of Interest Declarations on a quarterly basis.

Internal Gift Register (R300 Threshold): While the statutory immaterial limit is R1,000 per calendar year, GHT enforces an internal threshold of R300. All gifts, hospitality, or benefits valued at R300 or more must be declared in writing and recorded in the compliance file within 5 business days of receipt to prevent accidental breach of the R1,000 statutory limit.

Annual Ownership & Associate Audits: The Annexures to this policy detailing Associates and Ownership Interests are reviewed and updated annually.



5. AVOIDANCE, MITIGATION & CLIENT DISCLOSURE

5.1 Evaluation Protocol

Upon identifying an actual or potential conflict:

Convene Review: Key Individuals review the circumstances immediately.

Avoidance First: GHT determines whether an alternative, non-conflicting commercial arrangement can be achieved. If avoidable, the underlying cause must be removed promptly.

Mitigation: If the conflict is unavoidable, GHT establishes internal controls to ring-fence operational decision-making, ensuring client outcomes are protected.

5.2 Mandatory Client Disclosure

Where a conflict is unavoidable, GHT must disclose the conflict to the client in writing at the earliest reasonable opportunity:

Full disclosure of the nature, extent, and commercial context of the conflict.

Explanation of the measures taken to mitigate potential client prejudice.

Clear notice of any ownership interest or financial interest GHT or its representatives hold with the relevant product supplier or third party.

6. COMPLIANCE OVERSIGHT, TRAINING & RECORD KEEPING

Compliance Monitoring: The Compliance Officer audits GHT's Conflict of Interest Register and gift logs semi-annually and incorporates findings into the FSCA Annual Compliance Report.

Staff Training: All employees and representatives undergo annual conflict of interest training upon onboarding and thereafter once per year.

Policy Accessibility: This policy is maintained on GHT's compliance file and made available on GHT's official electronic platforms for client and underwriter reference.

7. NON-COMPLIANCE & DISCIPLINARY MEASURES

Failure by any representative or employee to disclose a conflict of interest, or accepting a financial interest in breach of this policy, constitutes a severe governance breach resulting in:

Formal internal disciplinary action (up to and including summary dismissal).

Debarment of representatives under Section 14 of the FAIS Act where dishonesty or non-compliance is established.

Reporting to the Financial Sector Conduct Authority (FSCA).

ANNEXURE A — LIST OF ASSOCIATES

Name of Associate	Nature of Relationship	Registration / ID Number
None	N/A	N/A

ANNEXURE B — PARTIES IN WHICH GHT HOLDS AN OWNERSHIP INTEREST

Name of Third Party / Entity	Nature & Extent of Ownership Interest	Percentage Held (%)
None	N/A	N/A

ANNEXURE C — PARTIES HOLDING AN OWNERSHIP INTEREST IN GHT

Name of Shareholder / Third Party	Nature & Extent of Ownership Interest	Percentage Held (%)
None	N/A	N/A

POLICY ADOPTION & APPROVAL

By signing this document, the undersigned Key Individuals formally adopt, maintain, and implement this Conflict of Interest Management Policy on behalf of GHT (Pty) Ltd in compliance with Section 3A of the FAIS General Code of Conduct.

Name & Surname	Designation	Date	Signature
Nicole du Plooy	Key Individual / Managing Executive	20/08/2026	
Michael du Plooy	Key Individual	20/08/2026	