

## **Conflicts of Interest Policy**

The policy applies to all employees of Noble Financial Advisors (Pty) Ltd

## What is a Conflict of Interest?

A conflict of interest may arise where a company or one of the company's employees, is providing financial services to a client, and may entail a material risk or damage to the client's 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, group of clients or any
  other third party over the interests of the client.
- 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 legislated commission
  or reasonable fee for that service.

## **Examples of a Conflict of Interest**

Our policy defines possible conflicts of interest as, inter alia:

- Conflicts of interest between our clients if we are acting for different clients and the different interests' conflict materially.
- Conflicts of interest where associates, product suppliers, distribution channels or any other third party is involved in the rendering of a financial service to a client.
- Storing confidential information on clients which, if we would disclose or use, would affect the
  advice or services provided to clients. We may only receive commissions authorised in terms of
  applicable legislation.

## Gifts, Hospitality & Inducements

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. Where a hospitality invitation could be construed as being a business inducement, it must be declined. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement and will not compromise **Noble Financial Advisors** integrity.

A register is kept of any gifts, or hospitality received.

Conflicts of Interest should always be avoided, wherever possible.

Conflicts or potential Conflicts of Interest must always be disclosed.