CONFLICT OF INTEREST MANAGEMENT POLICY

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1. Introduction

In terms of the Financial Advisory and Intermediary Services Act, 2002, Medway Marketing (Pty) Ltd is required to maintain and operate effective organizational and administrative arrangements with a view to taking all reasonable steps to identify, monitor, and manage Conflicts of Interest (COI). Section 3A(2)(a) of the FAIS General Code of Conduct stipulates that every financial services provider, other than a representative, must adopt, maintain, and implement a conflict-of-interest management policy that complies with the provisions of the Act.

2. Purpose

The purpose of this policy is to ensure compliance with FAIS obligations and provide mechanisms to identify, mitigate, and manage conflicts of interest. It aims to safeguard clients' interests and promote fair treatment. Medway Marketing (Pty) Ltd conducts business in an ethical and equitable manner that safeguards all stakeholders' interests and minimizes potential conflicts of interest.

3. Scope of Application

This policy applies to Medway Marketing (Pty) Ltd, all providers, key individuals, representatives, associates, and administrative personnel.
Non-compliance will be subject to disciplinary procedures and may result in debarment or dismissal as applicable.

4. Understanding Conflict of Interest

4.1 When is it a Conflict of Interest?

A Conflict of Interest arises when Medway Marketing (Pty) Ltd or a representative has an actual or potential interest that may influence the objective performance of obligations to a client or prevent the rendering of unbiased and fair financial services.

4.2 What Type of Interest May Be Given and Received?

Medway Marketing (Pty) Ltd and its representatives may only offer or receive specific financial interests, including remuneration for services rendered, immaterial financial interests, or fair value considerations.

4.3 Basis for Giving and Receiving Financial Interests

Financial interests may only be offered or received if proportionate to services rendered, not duplicative, do not create client conflicts, and do not impede fair client outcomes.

4.4 Financial Interests for Representatives

Medway Marketing (Pty) Ltd may not offer any financial interest that incentivizes preference for specific products or suppliers, or that prioritizes business volume over fair client outcomes.

5. Identification and Management of Conflict of Interest

All employees, representatives, and associates are responsible for identifying potential conflicts and reporting them to the Key Individual.
The Key Individual assesses each conflict and determines mitigation or disclosure measures.

5.1 Avoidance and Mitigation

Medway Marketing (Pty) Ltd maintains awareness through training and records unavoidable conflicts in a Conflict of Interest Register.
Identified conflicts are managed and disclosed in line with this policy.

5.2 Mandatory Disclosure

Conflicts that cannot be fully mitigated must be disclosed to clients, including monetary values of non-cash inducements, to allow informed decisions.

5.3 Ongoing Monitoring

The Key Individual monitors and assesses conflicts regularly.
Compliance is reviewed annually by an independent Compliance Officer and included in annual compliance reports.

5.4 Training

All staff and representatives receive comprehensive and annual refresher training on conflict-of-interest management as part of FAIS and General Code of Conduct training.

5.5 Registers

All gifts, financial interests, and conflict instances must be recorded in the Conflict of Interest Register (Annexure A).

6. Remuneration Policy

The remuneration policy aligns with King IV principles, supporting ethical governance, fairness, and transparency.
Representatives are remunerated by commission; other staff receive fixed salaries. The policy ensures fair pay, equal opportunity, and alignment with company goals.

7. Annexures

Annexure A – Conflict of Interest Register

Annexure A – Conflict of Interest Register

Type	Date Received	From	To	Reason	Value	Approved?	Approver	Sign

Review Date	Reviewed By	Designation	Signature
March 2025	Lance Allam	Director	Lance Allam