

Conflict of Interest Policy

Managing conflicts of interest in the provision of financial services

Effective Date: 17 August 2026

FSP 3955 | Authorised Financial Services Provider

1. Purpose and Scope

This Conflict of Interest Policy ("Policy") is adopted by Crawford Insurance Brokers (Pty) Ltd ("Crawford") in accordance with Section 3A of the Financial Advisory and Intermediary Services Act 37 of 2002 ("FAIS Act") and the General Code of Conduct for Authorised Financial Services Providers and Representatives, BN 80 of 2003 (the "Code").

This Policy applies to Crawford, all its key individuals, representatives and employees. It sets out how we identify, avoid, mitigate and manage conflicts of interest to ensure that we always act in the best interests of our clients.

2. Definition of Conflict of Interest

A conflict of interest means any situation in which Crawford or a representative has 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 Crawford or a representative from rendering an unbiased and fair financial service.

3. Identification of Conflicts of Interest

Conflicts of interest may arise in the following circumstances:

- Receipt of financial interests, gifts or other benefits from product providers
- Ownership or business interests in product providers or related entities
- Remuneration or incentive structures that may influence recommendations
- Personal relationships between representatives and clients
- Cross-selling arrangements that may not be in the client's best interest
- Business relationships with product providers that create dependency

4. Financial Interests

4.1 Permissible Financial Interests

Crawford may receive the following forms of financial interest from product providers:

- Commissions as authorised by the Long-term Insurance Act and Short-term Insurance Act
- Fees or remuneration for services legitimately rendered to product providers
- Training and educational support from product providers up to a value of R1,000 per representative per year
- Marketing and advertising support up to a value of R1,000 per representative per year

4.2 Prohibited Financial Interests

Crawford and its representatives may not receive or offer the following:

- Gifts, hospitality or other benefits exceeding R1,000 in value per provider per year
- Financial interests from product providers that are not disclosed to clients
- Incentives that would compromise the objectivity of advice given to clients
- Ownership interests in product providers not disclosed to clients

5. Disclosure to Clients

Crawford is committed to full and transparent disclosure. We will disclose to all clients:

- The existence of any ownership interest in product providers
- All forms of remuneration received from product providers in relation to the client's transaction
- Any other material financial interest that may influence the advice provided

Disclosure will be made at the time of providing financial advice and will be documented in the record of advice.

6. Measures to Avoid and Mitigate Conflicts

Crawford implements the following measures to manage conflicts of interest:

- We are an independent broker and are not owned by or affiliated with any product provider
- Representatives are required to base all recommendations on the client's needs and best interests
- All representatives receive training on conflict of interest identification and management
- Recommendations are documented and must be justifiable based on the client's financial needs analysis
- We maintain a register of all financial interests received from product providers
- Management reviews all material conflicts and determines appropriate action

7. Register of Financial Interests

Crawford maintains a register of all financial interests received from or provided to third parties. This register is available for inspection by clients on request. It includes:

- The name of the product provider or third party
- The nature and value of the financial interest received
- The date of receipt

8. Compliance and Monitoring

The key individual is responsible for ensuring compliance with this Policy. Any representative who becomes aware of an actual or potential conflict of interest must immediately disclose it to the key individual. Breaches of this Policy may result in disciplinary action.

9. Review

This Policy will be reviewed annually and updated as required to ensure ongoing compliance with applicable legislation and regulatory requirements.

10. Contact

For any queries regarding this Policy, please contact:

Crawford Insurance Brokers (Pty) Ltd
Attention: Key Individual / Compliance Officer
Email: enquiries@crawfordbrokers.co.za

Last reviewed: 03 September 2026