



# Conflict of Interest Manual

**Moresure Brokers (Pty) Ltd (FSP 54559) & MortgageMarket (Pty) Ltd**

**Last Update:** March 2025

**Next Update:** March 2026

## 1. Purpose and Scope

The purpose of this Conflict of Interest Policy is to provide a clear framework for identifying, managing, and mitigating conflicts of interest within Moresure Brokers and MortgageMarket.

Moresure Brokers (Pty) Ltd is an authorised Financial Services Providers under the FAIS Act and must comply with its conflict of interest provisions. This policy applies to all directors, key individuals, representatives, employees, and contractors.

## 2. Definitions

- **Conflict of Interest:** Any situation where financial or personal considerations may compromise, or appear to compromise, the objectivity and fairness of advice or service given to a client.
- **FSP:** Moresure Brokers (Pty) Ltd (FSP 54559)
- **Responsible Person:** Any key individual, representative, or employee of either company.
- **Financial Interest:** Includes cash, gifts, discounts, hospitality, sponsorship, or other benefits (excluding ownership interests and approved training).
- **Immaterial Financial Interest:** Any financial interest not exceeding R1,000 in value per provider or product supplier in a calendar year.
- **Third Party:** Includes product suppliers (insurers and banks), other FSPs, associates, or distribution channels.
- **Associate:** Includes related companies, directors, shareholders, family members, and trusts as defined in FAIS.

## 3. Identification and Management of Conflicts

Conflicts may arise where:

- MortgageMarket originates a mortgage for a client and simultaneously refers the same client to Moresure for insurance products.
- Representatives receive incentives from product suppliers (banks, insurers, underwriters).
- Directors or shareholders have ownership interests in related companies or product suppliers.

#### **Management Process:**

1. **Conflict Register:** Both FSPs maintain a central register of all identified conflicts, updated regularly and reviewed annually.
2. **Employee Disclosure:** All staff must disclose potential conflicts immediately to their manager or compliance officer.
3. **Assessment:** Compliance reviews the severity and reputational risk. If unmanageable, the transaction may not proceed.
4. **Controls:** Where conflicts can be mitigated, measures are documented and monitored.

#### **4. Mitigating Controls**

- Representatives may only receive financial interest from third parties in the form of:
  1. Agreed client fees where no commission is payable.
  2. Reasonable remuneration for services rendered to a third party.
  3. Immaterial financial interests ( $\leq$  R1,000 p.a.).
- No financial interest may be offered or accepted that:
  - Prioritises volume over quality of service.
  - Creates bias towards one product supplier over others.
- Disclosure must be made to clients in writing at the earliest reasonable opportunity, including:
  - Nature of the conflict.
  - Mitigation measures.
  - Any financial or ownership interests.

#### **5. Registers Maintained**

- **Register of Associates:** Lists related entities.
- **Conflict of Interest Register:** Logs actual and perceived conflicts and mitigation actions.
- **Personal Interest Register:** Declares outside business interests of directors and key individuals.

- **Gifts Register:** Records all gifts, hospitality, or immaterial financial interests.

## **6. Training & Awareness**

- All staff receive annual training on this policy and FAIS conflict provisions.
- New employees must read and acknowledge the policy upon joining.

## **7. Monitoring & Enforcement**

- Internal compliance conducts ad hoc checks of financial records and gift registers.
- External compliance includes this policy in annual FAIS monitoring.
- Breaches may result in disciplinary action, including dismissal or debarment.

## **8. Practical Guide – The “R1,000 Rule”**

Key Individuals and Representatives may not accept gifts, meals, entertainment, or other benefits exceeding R1,000 per provider or supplier in a calendar year.

Approved training or industry information sessions are excluded, provided:

- They are open to a wide group (not selective).
- Travel and accommodation are not paid by the provider.
- Meals are incidental and not excessive.

## **9. Appendices**

- **Appendix A – Register of Associates**
- **Appendix B – Conflict of Interest Register**
- **Appendix C – Personal Interest Register**
- **Appendix D – Gifts Register**

**Appendices**

**Appendix A – Register of Associates**

NAME	RELATIONSHIP

**Appendix B – Conflict of Interest Register**

<b>CONFLICT IDENTIFIED</b>	<b>PERSON REPORTING</b>	<b>ACTION TAKEN / CONTROL MEASURE</b>

**Appendix C – Personal Interest Register**

NAME	DECLARED INTEREST

**Appendix D – Gifts and Non-Cash Incentives Register**

<b>PRODUCT PROVIDER / CLIENT</b>	<b>GIFT ITEM &amp; MONETARY VALUE</b>	<b>DATE RECEIVED</b>	<b>REASON</b>	<b>RESPONSE / COMMENTS</b>