



Dear Employees

The amended FirstRand FAIS conflict of interest policy was approved on 8 November 2021 with an effective date of 1 December 2021.

Why do we have this policy?

Section 3A (2) of the FAIS General Code of Conduct (GCOC) sets out the requirement for a Financial Services Provider (FSP) to develop and publish a policy covering how it will ensure that the conflict of interest requirements in section S3A (1) of the General Code of Conduct are complied with.

This policy was drafted to comply with the above GCOC sections for all 19 FSPs within FirstRand. This policy requires an annual review.

Who is impacted by the requirements in this policy?

This policy is applicable in South Africa, as well as to all Financial Service Providers (FSPs) in FirstRand, in all countries and regions, who have been issued with a licence by the Registrar of Financial Services, to provide financial services in terms of Section 7 of the FAIS Act.

All employees (including but not limited to FAIS representatives and key individuals) of business units, divisions, customer segments, sub-segments, FSPs and legal entities of FirstRand who may be regarded as a "third party" as defined in the GCOC, are impacted.

What do you need to comply with?

All entities and employees mentioned above:

- Have a duty to avoid and/or mitigate a conflict of interest (where not avoidable).
- Must adhere to the requirements relating to the giving and receiving of financial interest (example: gifts and entertainment). The giving and receiving of certain financial interests are specifically prohibited by section 3 of the GCOC, with some exceptions relating to immaterial financial interest.
- Must adhere to the requirements relating to the offering and paying of sign-on bonuses to FAIS representatives.
- Must also adhere to other related FirstRand policies i.e. the FirstRand conflict of interest policy, FirstRand ABC Policy and the FirstRand sponsorship, donations, gift, and entertainment (SDGE) standard.
- Must adhere to the R1000 limit per year, per rep from each third party when giving or receiving immaterial financial interest in relation to FAIS products.

When is the policy applicable?

This policy is applicable only when any action undertaken by an entity or employees mentioned above amounts to/ may amount to an actual, perceived or potential conflict of interest, preventing the provision of an unbiased, objective and fair FAIS financial service to a client as regulated by the FAIS General Code of Conduct.

This policy will not apply to any financial service which is currently exempt from the provisions of the FAIS Act.

When is the policy effective from?

Employees are required to comply with this version of the policy from 1 December 2021.

This Policy will be posted on the FirstRand website on the effective date, using the same link below.

How do you comply?

All Employees are bound by all policies and procedures applicable to them, as issued by FirstRand and/or the entities mentioned above from time to time. Failure to comply with this Policy may lead to disciplinary and/or debarment action being taken against you.

Therefore, you need to ensure you read, understand and adhere to the requirements and procedures contained in the Policy. If you unsure whether you are impacted by this Policy or cannot access the links below, please consult your Compliance Officer.

Useful links:

- 1) Link to this **current** Policy on the FirstRand website:
<https://www.firststrand.co.za/investors/governance-and-compliance/>
- 2) Link to the FirstRand Conflict of Interest Policy (copy link and use Chrome):
[https://firststrandgroup.sharepoint.com/:b:/r/sites/FCCEthics/FirstRand%20ethics%20governance%20documents/FirstRand%20Conflict%20of%20Interest%20Management%20policy%20\(21%20May%202019\).pdf?csf=1&web=1&e=ypAsQV](https://firststrandgroup.sharepoint.com/:b:/r/sites/FCCEthics/FirstRand%20ethics%20governance%20documents/FirstRand%20Conflict%20of%20Interest%20Management%20policy%20(21%20May%202019).pdf?csf=1&web=1&e=ypAsQV)
- 3) Link to the FirstRand ABC Policy:
<https://firststrandgroup.sharepoint.com/sites/RCRMP/Policies/FirstRand%20Anti-Bribery%20and%20Corruption%20Policy.pdf>
- 4) Link to the FirstRand Sponsorship, Donations, Gift and Entertainment Standard (copy link and use Chrome):
<https://firststrandgroup.sharepoint.com/:b:/r/sites/FCCEthics/FirstRand%20ethics%20governance%20documents/FirstRand%20SDGE%20Standard%202019.pdf?csf=1&web=1&e=m5ikln>