Conflict of Interest Management Policy (Super Money SA Limited)

Version 1

February 2026

Super Money SA (Pty) Limited
1 Waterview Close
Century City
Cape Town
South Africa

Co Reg No.: 2022/614959/07

Super Money SA (Pty) Ltd. Part of Super group

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1. POLICY ADMINISTRATION

Policy Details	
Policy Owner	Compliance
Policy Level	Policy
Level of Approval	Board of Directors
Frequency of Review	Annually or if any material legislative or operational changes occur

Revision Date	Document Version	Summary of Changes	Author
February 2026	V1	Creation of Document	Compliance

This Policy has been approved as follows:

Position/Structure	Document Version	Signature and Date of Approval
Licensed Entity Board Director	V1	Anthony Prissman (Feb 24, 2026 18:03:33 GMT+2)

2. PURPOSE

Super Money is committed to conducting its business with integrity, transparency, and in the best interests of its customers. In the normal course of business, conflicts of interest may arise where personal, financial, or other interests interfere, or appear to interfere, with the obligations owed to Super Money or its customers.

This Conflict-of-Interest Management Policy ("the Policy") sets out the framework for identifying, disclosing, managing, and monitoring actual or potential conflicts of interest to ensure that customer interests are not compromised and that Super Money complies with applicable regulatory requirements.

The purpose of this Policy is to ensure that Super Money SA Pty Ltd identifies, avoids, manages, mitigates, and discloses actual, potential, or perceived conflicts of interest in accordance with the Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS) and the General Code of Conduct for Authorised Financial Services Providers and Representatives ("the Code").

This Policy aims to protect the interests of clients, uphold the integrity of the financial services industry, and ensure that financial services are rendered honestly, fairly, with due skill, care, and diligence, and in the best interests of clients, as required by the Code.

Super Money SA Pty Ltd is committed to ensuring that all business is conducted in accordance with good business practice. Super Money SA Pty Ltd will conduct business in an ethical and equitable manner and in a way that safeguards the interests of all stakeholders to minimise and manage all real and potential conflicts of interests. Like any financial services provider, Super Money SA Pty Ltd is potentially exposed to conflicts of interest in relation to various activities. However, the protection of our clients' interests is our primary concern and so our policy sets out how:

- Super Money SA Pty Ltd will identify circumstances which may give rise to actual or potential conflicts of interest entailing a material risk of damage to our clients' interests.
- Super Money SA Pty Ltd will establish appropriate structures and systems to manage those conflicts; and
- Super Money SA Pty Ltd will maintain systems to prevent damage to our clients' interests through identified conflict of interest.

3. SCOPE OF APPLICATION

This Policy applies to:

- Directors and Board Members
- Key Individuals
- Employees

- Temporary staff, consultants, and contractors
- Any person acting on behalf of Super Money

The Policy applies to all financial services and intermediary services rendered by the Super Money SA Pty Ltd under its FSCA licence.

4. DEFINITIONS

A conflict of interest arises where a person's private, personal, financial, or other interests may improperly influence, or be perceived to influence, the performance of their duties or decision-making on behalf of Super Money.

For purposes of this Policy, the definitions contained in the FAIS Act and the General Code of Conduct apply. In summary:

- Conflict of Interest means any situation in which Super Money SA 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 an unbiased and fair financial service.
- Financial Interest includes any cash, cash equivalent, gift, benefit, advantage, discount, service, or other valuable consideration, excluding regulated commission and fees as permitted under FAIS.
- Ownership Interest means any equity or proprietary interest held in Super Money SA Pty Ltd or a third party. This may include:
  - Fair Value: Has the meaning assigned to it in the financial reporting standards adopted or issued under the Companies Act, 61 of 1973.
  - New Entrant: Is a person who has never been authorised as a financial services provider or appointed as a representative by any FSP.
  - Sign-On Bonus: Is any financial interest offered or received directly or indirectly, upfront or deferred, and with or without conditions, as an incentive to become a provider
- Immaterial Financial Interest has the meaning assigned in the Code.

These definitions are aligned to FSCA guidance and industry standards.

5. IDENTIFICATION OF CONFLICTS OF INTEREST

Super Money SA Pty Ltd has implemented mechanisms to identify conflicts of interest, including:

- Mandatory annual conflict-of-interest declarations by all affected persons.
- Ad hoc declarations where circumstances change.
- Ongoing monitoring of relationships with product suppliers, third parties, and associates; and
- Compliance oversight and review.

All persons covered by this Policy are required to proactively identify and declare any actual, potential, or perceived conflict of interest as soon as it arises.

Conflicts of interest may include, but are not limited to:

- Holding a direct or indirect financial interest in a competitor, supplier, or service provider.
- Accepting gifts, hospitality, loans, inducements, or preferential treatment from parties doing business with Super Money.
- Using confidential or privileged information for personal gain.
- Outside employment or business activities that interfere with duties to Super Money.
- Participating in procurement, contracting, or decision-making where a personal relationship exists.
- Authorising benefits, loans, or transactions for oneself or close family members.

6. AVOIDANCE AND MITIGATION OF CONFLICTS

Where possible, conflicts of interest must be avoided. Where avoidance is not reasonably possible, Super Money SA Pty Ltd will mitigate the conflict through appropriate controls, which may include:

- Segregation of duties.
- Recusal from decision-making.
- Limitation or prohibition of certain financial interests.
- Enhanced oversight or independent review; and
- Adjustments to remuneration or incentive structures.

No conflict may be managed in a manner that compromises fair client outcomes or regulatory compliance.

7. DISCLOSURE OF CONFLICTS OF INTEREST

All actual or potential conflicts of interest must be disclosed promptly to line management and the Compliance function.

Where required, conflicts will be:

- Recorded in the Conflict-of-Interest Register
- Assessed by the Compliance function and/or Key Individual
- Escalated to senior management or the Board where appropriate

Failure to disclose a conflict may result in disciplinary action.

Super Money SA Pty Ltd will disclose to clients, in writing and at the earliest reasonable opportunity:

- The existence and nature of any conflict of interest.

- Any financial or ownership interest involved; and
- The measures taken to avoid or mitigate the conflict.

Disclosures must be clear, fair, and not misleading, enabling clients to make informed decisions.

8. FINANCIAL INTERESTS, GIFTS, AND HOSPITALITY

No person may solicit or accept gifts, hospitality, or benefits that could reasonably be perceived as influencing business decisions, unless approved in accordance with Super Money's internal guidelines. All such items must be declared where applicable.

Super Money SA Pty Ltd and its Representatives may not offer or receive financial interests other than those permitted under the Code.

- Gifts and hospitality must be reasonable, infrequent, and not intended to influence decision-making.
- All gifts and hospitality above the prescribed threshold must be recorded in a Conflict-of-Interest Register; and
- Prohibited financial interests are strictly disallowed.

These controls align with section 3A of the Code and FSCA expectations.

9. MANAGEMENT OF CONFLICTS

Once identified, conflicts of interest will be managed through one or more of the following measures:

- Avoidance of the conflicted activity
- Recusal from decision-making
- Restriction of access to information
- Disclosure to affected customers where appropriate
- Declining to act where the conflict cannot be adequately managed

Where disclosure to customers is required, Super Money will ensure transparency and provide sufficient information to enable informed decision-making.

10. ROLES AND RESPONSIBILITIES

- Employees and Representatives are responsible for identifying and disclosing conflicts of interest
- Management is responsible for assessing and managing disclosed conflicts
- Compliance is responsible for maintaining the Conflict-of-Interest Register, monitoring adherence, and reporting to the Board
- The Board retains ultimate oversight of conflict management.

11. TRAINING AND AWARENESS

All relevant persons will receive appropriate training on this Policy and are expected to understand and comply with its requirements. Ignorance or failure to act is not an acceptable defence.

Any breach of this Policy may result in disciplinary action, up to and including termination of employment or contractual arrangements.

12. RECORD-KEEPING AND REGISTERS

Super Money SA Pty Ltd will maintain:

- A Conflict-of-Interest Register.
- Records of disclosures made to clients; and
- Evidence of mitigation measures implemented.

All records will be retained in accordance with statutory record-keeping requirements.

13. GOVERNANCE, COMPLIANCE, AND MONITORING

The Compliance Function is responsible for:

- Monitoring adherence to this Policy.
- Providing training and guidance.
- Reporting material conflicts to senior management and the Board; and
- Reviewing the Policy at least annually or upon regulatory change.

Non-compliance with this Policy constitutes a disciplinary offence and may result in regulatory reporting where required.

14. POLICY APPROVAL AND REVIEW

This Policy is approved by the Board of Directors of Super Money SA Pty Ltd and is made available for public inspection as required by the FAIS Act. The Policy will be reviewed regularly to ensure ongoing compliance with applicable legislation and FSCA guidance.

This Policy will be reviewed at least annually and included in compliance reporting to ensure ongoing effectiveness and regulatory alignment.