

CONFLICT OF INTEREST POLICY

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1. SCOPE OF POLICY

This policy shall apply to all employees employed as a permanent employee, temporary employee, and contract employee or as a section 57 appointment by **EagleSure** who fall within the registered scope of any applicable Legislative Institution within the Republic of South Africa

2. CONFLICT OF INTEREST DEFINED

Conflict of interest is defined as:

Employees are under a positive duty to harness their energies and skills to furthering their employer's business interests. They must devote all their normal working hours to the employer's business and may not without the employer's permission simultaneously work for another employer during those hours. Employees may not enter into a second contract of employment at all if the other employer's business interests are in conflict with those of the principal employer, or enter into any arrangement, which entails a conflict between their own interests and those of their employers. Employees who secretly compete with their employer's business for their own account breach their fiduciary duty. Failure to disclose a financial interest in another company can also constitute a breach of the employee's obligation to act in good faith towards his or her employer where the employee stands to gain financially from dealings between the employer and the company in which he or she has an interest.

3. OBJECTIVE OF THE POLICY

The objective of this policy is to regulate and clarify conflict of interest within the workplace for all employees and to set guidelines regarding such. The policy further sets the benchmark as far as: All employees must avoid personal activities or interests which conflict or may conflict with their duty and loyalty to the company.

4. PERIOD OF OPERATION

This policy will remain in force from date of acceptance until amended and circulated as an updated policy.

5. RULES & REGULATIONS – CONFLICT OF INTEREST.

No Director, Manager or staff member:

- May have any outside interests in any transactions to which **EagleSure** is a party, if such interests might in any way influence the performance of his duties for the Company, unless the outside interest has prior written approval **EagleSure**.
- May seek or accept gifts, loans, shares, share offers or preferential treatment in respect of amenities or services from any party having business with **EagleSure**.
- May have any interest direct or indirect in any competitor of **EagleSure**.
- May use or disclose any information obtained from **EagleSure** sources, which is not generally available to the public, for personal gain or for any reason other than that authorized for Financial product or Insurance purposes.
- May not authorise a policy to him/herself.
- May not act in contradiction to a procurement policy or any guidelines in such respect as defined by the FSB.
- May not secure, source, canvass or promote any business or business activities for an external company, supplier or contractor within the brokerage where such employee stands to gain directly, indirectly as friends, family, or in any other way which may be deemed to be personal or unethical.
- May not act in any other manner that could be construed or interpreted as a conflict of interest.
- A staff member of **EagleSure** may not unduly influence or attempt to influence the Clients or a Insurer with the view of obtaining any appointment, promotion, privilege, advantage or benefit, or a family member, friend or associate.
- A member of staff may also not take a decision on behalf of **EagleSure** concerning a matter in which that staff member, or member's spouse, partner or business associate, has a direct or indirect personal or private business interest.
- A staff member may also not mislead or attempt to mislead **EagleSure**, a client or any insurer, in its consideration of any matter.
- A member of staff may also not be involved in a business venture with an insurer.

- A member of staff may not disclose any privileged or confidential matters or information.
- A member of staff may not without the prior written consent of **EagleSure** obtain any financial interest in any business of **EagleSure** or be engaged in any business, trade or profession other than the work of **EagleSure**.
- A staff member will disclose any benefit acquired or stand to acquire directly or indirectly from a contract concluded with **EagleSure**, and submit full details of such direct or indirect benefit.

6. EXTERNAL ACTIVITIES

Jobs within **EagleSure** have been structured to be both challenging and demanding and employees are rewarded accordingly. **EagleSure**, therefore, should enjoy the full contribution, time and energy of its employees, whose leisure time should be devoted to relaxation. Hence **EagleSure** is not in favour of employees pursuing other business interests, which involve personal participation and risk. Contacts made and information obtained through **EagleSure** service providers may not be used in the interests of private business.

7. RECIPROCAL BUSINESS

All normal forms of maintaining good business relations should be encouraged with service providers or any business entity connected with **EagleSure**.

8. GIFTS

The tradition of marking friendship with a gift is one of those pleasant customs that make human relations the warmer. However, no exchange of gifts should occur at Christmas time or at any other time of the year. Anything other than a token gift is capable of misinterpretation by either the donor or the recipient with all the consequent embarrassment or offer of anything more than "a token gift".

Gift - This includes receipt of loans, payments, services, personal travel, entertainment, gifts or favours of more than token value from customers or suppliers, or from a person doing or seeking to do business with **EagleSure**, any gratuity, discount, entertainment, hospitality, forbearance, or other tangible or intangible item having monetary value, including but not limited to, cash, food and drink, and honoraria for speaking engagements related to or attributable to clients and or service providers or the official position of an employee.

Except in unusual circumstances, gifts or favours having values beyond common courtesy or accepted business practice should be declined or returned. Gifts of money or other valuables can never be accepted. A staff member must without any delay report to the director. Any offer made by an external person, company, supplier, or contractor which, if accepted by the member of staff, would result in a conflict of interest. It is the responsibility of Directors and Managers to ensure that employees know the policy on gifts and gratuities and that it is properly enforced. Employees who have questions regarding this policy or who are uncertain as to whether a conflict of interest exists should confer with their supervisors of **EagleSure**.

9. DISCIPLINE

Should any Director, Manager or employee be found deviating from this policy in any way **EagleSure** reserves the right to take the appropriate disciplinary measures against such Director, Manager or member of staff.

10. PROCEDURE TO DECLARE

In the event where an employee needs to advise or seek permission from **EagleSure** such request or information will be writing and will be forwarded to the Manager or his duly authorised proxy.