

MORTIMER TOYOTA'S CONFLICTS OF INTEREST MANAGEMENT POLICY

1. Introduction

1.1. The General Code of Conduct imposes a general duty on Mortimer Toyota to, at all times, render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry.

1.2. The provisions of the General Code of Conduct which related to conflicts of interest were amended by Board Notice 58 of 2010 providing for, inter alia, the development of a conflicts of interest management policy.

2. Adoption of the policy

2.1. This conflicts of interest management policy shall be known as the Mortimer Toyota COI Policy and has been formally adopted by the Board of Directors of Mortimer Toyota. Management is responsible for the implementation of this policy and the Compliance Officer shall ensure appropriate training and monitoring thereof.

3. Annual Review of the policy

3.1. The Mortimer Toyota COI Policy shall be reviewed on an annual basis

4. Publication of the policy

4.1. The Mortimer Toyota COI Policy is available to all clients and may be accessed at the offices of Mortimer Toyota during office hours.

5. Training

5.1. All representatives and employees of Mortimer Toyota must be trained on the content of this policy.

6. Monitoring

6.1. Mortimer Toyota must monitor compliance with the Mortimer Toyota COI Policy on an ongoing basis. Monitoring is the responsibility of the Compliance Officer who shall report to management and the Board of Directors in respect of the results of such monitoring.

7. Consequences of non-compliance with the policy

7.1. All employees and representatives of Mortimer Toyota must comply with the procedures contained in this policy.

7.2. Non-compliance with the Mortimer Toyota COI Policy will result in a disciplinary hearing and appropriate disciplinary action.

8. Aim of the Policy

8.1. The aim of the Mortimer Toyota COI Policy is to avoid or mitigate any conflict of interest that may arise between Mortimer Toyota and its clients or any of Mortimer Toyota's employees or representatives and its clients.

9. Identification and reporting of conflicts of interest

9.1. Definition of "conflict of interest":

"Conflict of interest" means any situation in which a provider or a representative has an actual or potential interest that may, in rendering a financial service to a client, -

- (a) influence the objective performance of his, her or its obligations to that client; or
- (b) prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client, including but not limited to –
 - (i) a financial interest
 - (ii) an ownership interest
 - (iii) any relationship with a third party.

9.2. How to identify a "conflict of interest"?

A conflict of interest arises if you are influenced to not act fairly, independently or objectively towards your client because of some factor such as a financial interest.

In order to identify whether you are acting in your client's best interest, ask yourself the following questions:

- Do I have my client's best interest at heart, or am I acting in my own best interest?
- Am I acting professionally?
- Am I acting independently?
- Am I acting objectively?
- Are my interests aligned with my client's interests?

9.3. Reporting a "conflict of interest"

Once you have identified a conflict of interest, report the conflict of interest to your Key Individual, Wynand Wessels or Compliance Assistant, Carmen Seele who will assist you in the avoidance or mitigation thereof as well as the disclosure thereof.

10. Avoidance or mitigation of conflicts of interest

10.1. Representatives and employees must avoid conflicts of interest between Mortimer Toyota and the client or themselves and the client.

10.2. If they are unable to avoid the conflict, they must provide the reasons therefore and they must identify measures to mitigate the conflict.

11. Disclosure of conflicts of interest

11.1. Where a conflict of interest has been identified, it must be disclosed to the client, together with the following information:

- The measures taken to avoid or mitigate the conflict of interest,
- Any ownership or financial interest that Mortimer Toyota or the representative may be eligible for,
- The nature of the relationship giving rise to the conflict of interest in sufficient detail to enable the client to understand the nature of the relationship and the conflict of interest, and
- The Mortimer Toyota COI Policy and that it can be accessed via Mortimer Toyota's office, the website or directly from the call centre.

12. Financial interests offered to representatives and how that complies with section 3A(1)(b)

- 12.1. Section 3A(1)(b) prohibits the following conduct:
- A provider offering financial interest to a representative for giving preference to the quantity of business secured for the provider to the exclusion of the quality of the service rendered to client; or
 - A provider offering financial interest to a representative for giving preference to a specific product supplier, where a representative may recommend more than one product supplier to a client; or
 - A provider offering financial interest to a representative for giving preference to a specific product of a product supplier, where a representative may recommend more than one product of that product supplier to a client.

- 12.2. Representatives of Mortimer Toyota are remunerated with a basic salary and commission.

13. List of Associates. None

14. Names of any Third Parties which the provider holds an ownership interest in. None

15. Names of any Third Parties that hold an ownership interest in the provider. The Seele Family Trust. Hallmark Motor Group.