



Conflict of Interest Policy

1. Purpose

This policy sets out the approach of Advice Matters (the "Firm") to identifying, managing, and disclosing conflicts of interest that may arise in the course of providing financial advice and intermediary services. The Firm is committed to ensuring that all business is conducted in the best interests of clients, in compliance with the Financial Advisory and Intermediary Services Act (FAIS) and related regulations.

2. Scope

This policy applies to:

- All directors, key individuals, representatives, employees, and contractors of the Firm.
- All activities conducted in the rendering of financial advice and intermediary services to clients.

3. Key Principles

1. Best Interest of Clients

- Advisors must always place the interests of clients above their own or those of the Firm.

2. Disclosure of Financial Interests

- Any financial or ownership interest, commission, fee, or other benefit received by the Firm or its representatives must be disclosed to clients in writing prior to rendering advice or services.

3. Avoidance of Conflicts

- The Firm will avoid situations where actual or potential conflicts of interest may compromise objectivity or client interests.

4. Management and Mitigation

- Where conflicts of interest cannot be avoided, they will be properly managed through disclosure, oversight, and client consent.

5. Compliance and Monitoring

- The Firm has implemented internal monitoring processes to ensure adherence to this policy and to FAIS requirements.

4. Identification of Conflicts of Interest

Conflicts of interest may arise where:

- The Firm or its representatives receive financial incentives that may influence advice.
- Personal relationships or outside business interests of representatives could impact objectivity.
- The Firm has ownership interests or product provider relationships that may influence recommendations.

5. Management of Conflicts

The Firm manages conflicts of interest through:

- Maintaining a register of conflicts of interest.
- Disclosure to clients of any conflict that cannot be avoided.
- Training and awareness for all representatives.
- Internal monitoring, including audits and compliance reviews.

6. Disclosure to Clients

- Clients will be informed of any relevant conflict of interest in writing, in clear and understandable language, before any financial product or service is rendered.
- Disclosures will include the nature of the conflict, its potential impact, and how it will be managed.

7. Prohibited Practices

Representatives and employees may not:

- Accept gifts or inducements that could influence advice.
- Give preference to any product supplier where such preference is not in the best interests of clients.
- Enter into arrangements that create undisclosed conflicts of interest.

8. Compliance Oversight

- The Compliance Officer is responsible for monitoring the implementation of this policy.
- All staff are required to report any actual or potential conflicts to the Compliance Officer immediately.
- Regular reviews will be conducted to ensure effectiveness of this policy.

9. Record Keeping

- The Firm will keep a register of conflicts of interest and related disclosures.
- Records of all disclosures and conflict management actions will be retained in accordance with regulatory requirements.

10. Review of Policy

This policy will be reviewed annually, or more frequently if required, to ensure continued compliance with FAIS and to address emerging risks.