Policy Review Control Sheet

Governance Area	Financial Governance (as per Governance Framework)	
Policy Name	Financial Soundness Monitoring Policy	
Policy Owner (FSP) & Version #	ABC Financial Services	3
Original & Previous approval	23 March 2022	01 August 2024
Review Frequency & Month	Annually	July
Next Review Date & Month	July 2026	July

Policy Review Details

Date of Review	15 July 2025
Reviewer Name(s)	
Summary of Changes	Updated procedure for recording of monthly statistics
Reason for Changes	To provide clarity on the admin processes to be followed
Approval Status	Approved
Approved By Signature(s)	
Approval Date	05 August 2025

Change Log

Date	**Change Description**	**Changed By**	**Version #**
03/07/24	No changes		2
15/07/25	Clause 4.2 Procedure		3

Training & Implementation

Planning	**Responsible Person:**

Confirmation of Training & Implementation

Confirmation	**Responsible Person:**
Date, Time, Attendees, Presentation recorded in the **Inhouse Training Register**	

STAFF CONDUCT TO AVOID CONFLICTS OF INTEREST

WEALTH CREED

1. ACTION OR BEHAVIOURS TO AVOID

Below, you will find some situations, behaviours or events that should be avoided at all costs, by members of staff, managers or other third party contractors.

1.1 PERSONNAL INTEREST

Employees must ensure that no conflict exists or could appear to exist between their personal interests and those of Wealth Creed, potential competitor, customer, partner, vendor, supplier or other business entity in which you have a direct or indirect financial interest.

Employees must not:

- Take part in or attempt to influence any company decision or any business dealings with a current or potential competitor, customer, partner, vendor, supplier or other business entity in which you have a direct or indirect financial interest
- Use the premises, equipment, supplies or services of other employees of Wealth Creed to promote their personal interests;
- Use confidential information for their personal benefit during or after employment with Wealth Creed;
- To be in a position where they could benefit directly or indirectly from a company business transaction (e. g. supplier of goods or services, contract, license or partnership);
- Give preferential treatment to any supplier or other person doing business with Wealth Creed in order to serve their personal interests;
- Invest in, own, have an interest in, or be an employee of an organization that might have an interest, direct or indirect, in any company commercial transaction, except in the case of a widely held public company whose dealings with Wealth Creed do not represent a substantial portion of its total business;

This should not be interpreted as an exhaustive list of all circumstances that could lead to a real or perceived conflict of interest.

1.2 FAMILY, FRIENDS AND ROMANTIC RELATIONSHIPS

Employees and managers must not:

- Use their position or contacts at Wealth Creed to promote their personal interests or those of a family member or person with whom they have a close personal or professional relationship;
- Take part in or attempt to influence any company related decision or business dealings (including those concerning current or potential customers, partners, vendors or suppliers) that may benefit or appear to benefit a relative, close personal friend or a business enterprise in which a relative or close personal friend is involved or has a direct or indirect financial interest.
- Wealth Creed generally does not permit work situations where a manager directly or indirectly manages a relative or a person with whom he/she has a romantic relationship. If you are aware that Wealth Creed plans to hire your relative or a person for a position with whom you have a romantic relationship that directly or indirectly reports to you, you must disclose that information immediately

- If, during the course of your employment, a romantic relationship develops between you and another company employee within your direct or indirect reporting chain, you both must promptly disclose that information. Although employees involved in a consensual relationship are individually responsible for disclosure, a manager's failure to report such a relationship will be grounds for appropriate disciplinary action.

1.3 RELATIONSHIPS AND FAVOURITISM

Employees shall not grant or appear to grant preferential treatment to a person with whom they have a close personal or professional relationship. In some situations, past relationships may also give rise to a perceived conflict of interest and should be treated as such.

If an employee is in a situation where he or she could make a decision (e. g. hiring, evaluation, discipline, promotion, reward, any other form of discretionary control or the awarding of a contract) involving, directly or indirectly, a person with whom he or she has a close personal or professional relationship, the employee must:

- Disclose the potential conflict to his/her manager
- Refer the decision to the manager or someone designated by him/her
- Refrain from making any recommendations or conveying views related to the decision.

In addition, if an employee is in a position of authority over a person with whom he or she has a close personal or business relationship, the manager must change the hierarchical relationship between the employee and that person. The manager may also take other measures to reduce the appearance of conflicts of interest, if necessary.

1.4 OUTSIDE BUSINESS ACTIVITIES

Employees are permitted to engage in outside employment or activities as long as they inform their manager prior to starting such activity, and to the extent that;

- It does not compete with or reflect adversely on Wealth Creed or give rise to a conflict of interest.
- It does not engage in any outside activity that is likely to involve disclosure of Wealth Creed’s proprietary information or that is likely to divert time and attention from your responsibilities at Wealth Creed.
- It could not be reasonably perceived as compromising the integrity, independence and impartiality expected from Wealth Creed or bring Wealth Creed into disrepute;
- It does not inappropriately exploit the employee’s connection with Wealth Creed;
- It does not restrict your availability or efficiency;
- It does not involve acting as a spokesperson for another organization;
- Employees are permitted to act as board members of an organization external to Wealth Creed, if their participation meets the criteria above, and if authorized by their manager beforehand. You cannot serve as a board member or technical advisor of a competitor or of a company that may reasonably be expected to become a competitor

- Employees may be permitted to write books or work on other creative projects that are not in competition with Wealth Creed as long as they respect the criteria for outside activities mentioned above and obtain prior written authorization from their manager.

You are not required to seek approval of the following activities:

- Any affiliation with a trade association, professional association or other such organization related to your work or position at Wealth Creed.

- Participation in non-profit civic or charitable activities, including serving as a member of a board of directors or technical advisory board. However, you must obtain approval if the entity is a company customer or expects to receive or seek a contribution from Wealth Creed**.**

- Positions with co-op boards, condominium associations and similar entities where the sole purpose of such participation would be to hold title to and/or manage real property in which you can or do reside.

- Positions with holding companies, trusts or other non-operating entities established solely for purposes of you or your family's investment, estate or tax planning or to hold you, your family's real estate or other investments that would not otherwise require disclosure under this policy.

If the manager considers the outside activity to be inappropriate, considering the criteria mentioned above, it must inform the employee in writing and the employee must avoid, discontinue or modify his/her participation in such activities accordingly. Disclosures and their assessment by the manager must be documented.