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# JEANDRE BROKERS

A Registered Financial Service Provider, No. 34911

## **Conflict of Interest Management Policy for Jeandre Brokers**

### **1. Purpose**

The purpose of this policy is to establish guidelines to identify, manage, and disclose conflicts of interest that may arise in the course of business at Jeandre Brokers. This policy aims to ensure that all business activities are conducted in a fair, transparent, and ethical manner, thereby maintaining the trust of our clients and stakeholders.

### **2. Scope**

This policy applies to all employees, directors, and contractors of Jeandre Brokers, including any third parties acting on behalf of the company. It covers all potential conflicts of interest that may arise from personal, financial, or business relationships.

### **3. Definition of Conflict of Interest**

A conflict of interest occurs when an individual's personal interests, relationships, or activities could potentially interfere with their ability to make impartial decisions in the best interest of Jeandre Brokers and its clients. This includes situations where personal gain might influence professional judgment.

### **4. Identification of Conflicts**

Employees and associates are required to identify and disclose any actual or potential conflicts of interest to their manager or the compliance officer as soon as they arise. This includes, but is not limited to, financial interests in client transactions, receiving gifts or favors from clients or vendors, and any outside employment or business activities.

### **5. Management and Mitigation**

Upon disclosure of a conflict, the compliance officer will assess the situation and determine the appropriate course of action. This may include:

- Removing the individual from decision-making processes related to the conflict.
- Divesting the conflicting interest.
- Implementing additional oversight or review procedures.
- Providing training or guidance on handling similar situations in the future.



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## **6. Disclosure and Transparency**

Jeandre Brokers is committed to transparency with its clients and stakeholders. All identified conflicts of interest, along with the measures taken to mitigate them, will be documented and disclosed to the relevant parties as necessary.

## **7. Review and Monitoring**

This policy will be reviewed annually to ensure its effectiveness and compliance with applicable laws and regulations. Regular training sessions will be conducted to ensure all employees understand and adhere to the policy.

## **8. Non-Compliance**

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

## **9. Contact Information**

For any questions or further clarification regarding this policy, please contact the Compliance Officer of Jeandre Brokers.

By adhering to this Conflict of Interest Management Policy, Jeandre Brokers reinforces its commitment to ethical business practices and the integrity of its operations.

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