

CONFLICTS OF INTEREST POLICY

The business has a responsibility to ensure it has a suitable conflicts of interest management plan which involves assessing, managing, and reviewing potential conflicts of interest. Generally, we encounter very few conflicts of interest in our business. The following have been identified as potential conflicts of interest, and each one has our processes for managing them. As with the other parts of this compliance plan, this section is updated regularly, and conflicts of interest re-evaluated.

1. Credit Services

Regarding our service offerings, our products are very limited in range. In terms of the loan amount, our customers apply online and are not persuaded to apply for one product or another. Consumer need determines the product applied for.

2. Management Team

At the start of trading, the new management team will commence work full time for the business and have no particular financial interests or other arrangements that are likely to give rise to a conflict of interest. A yearly review is conducted by the Compliance Manager to note that nothing has changed in the past year.

3. Employees

Employees are appropriately vetted before commencement of employment. We include in our standard employment contracts a clause that precludes our employees from being influenced by any potential conflict of interest. We require our employees to sign an annual declaration confirming adherence to this policy. For more details on this, please see our staffing policy.

4. External Service Providers

As stated in the business outsourcing policy, we may from time to time use external service providers for some of our functions. Before using an external service provider, any potential conflicts of interest are assessed. Our current list of external service providers shows no potential conflicts of interest.

