

## DISCLOSURE NOTICE



Whilst we make every effort to ensure you fully understand the insurance product we have supplied, there are certain facts we are obliged in terms of legislation to ensure that you not only know about, but understand.

The most notable of these is the FINANCIAL ADVISORY AND INTERMEDIARIES SERVICES ACT (FAIS) and in the case of clients purchasing policies in their personal capacity the Policy Holder Protection Rules.

The most important objective of these obligations is to ensure that YOU, our client, has full knowledge about the organisations involved in delivering the service to you; as well as a full understanding of the product you have purchased.

If at any time you feel we have not provided you with information required, or if you do not understand the information we have given you, please ask us – do not assume!

Whilst this information is important, it does not form part of your actual policy wording.

### TERMINOLOGY EXPLAINED:

#### FINANCIAL SERVICE PROVIDER

This is your insurance broker, sometimes referred to as an *Intermediary*.

#### PRODUCT PROVIDER

This is your *Insurer*.

#### UNDERWRITING MANAGER

They are appointed by a Product Provider (Insurer) to manage a specific type of product on their behalf.

This is due to the specialist knowledge of the staff of the Underwriting Manager and their ability to deliver a very focused and cost effective service to ourselves as insurance brokers and ultimately you, the client. An Underwriting Manager may not deal with the public directly.

#### FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT (FAIS)

This legislation was introduced to ensure there are minimum standards set within the Financial Services Sector, so as to ensure that YOU, the client, receive the highest possible level of service and protection.

### THE FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT (FAIS) GOVERNS, AMONGST OTHER THINGS, THE FOLLOWING:

- The financial stability of the Financial Service Provider.
- The Honesty and Integrity of the Financial Service Provider.
- The ability of the Financial Service Provider to look after the client.
- The formal qualifications required by the key staff of any Financial Service Providers who give you advice, perform intermediary services and claims handling.
- The methods and technical content of the advice given to you by the Intermediary
- The need for each Financial Service Provider to be licensed before they can give you advice or perform intermediary services on your behalf.
- Standards for dealing with any complaint you may have.
- Penalties for breaches of any of the regulations required in terms of the Act; these include fines, imprisonment and loss of the ability to carry on business.
- The need for us to have a Compliance Officer to ensure we meet all our obligations in terms of the Act.

### POLICY HOLDER PROTECTION RULES

These require some additional duties to be adhered to by Insurers in respect of clients purchasing personal insurances. These will be pointed out in this document where applicable to you.

### NATIONAL FINANCIAL OMBUD SCHEME

The independent body created to further protect the client and deal with any disputes between insurers and clients. The INSURANCE OMBUD deals with disputes relating to:

- Motor Insurance
- Homeowners insurance (buildings)
- Household insurance (contents)
- Cell phone insurance
- Travel insurance
- Disability insurance
- Credit protection insurance
- Commercial insurance for small businesses and sole proprietors

#### PHYSICAL ADDRESS

NFO Johannesburg:  
110 Oxford Road, Houghton Estate, Illovo, Johannesburg, 2198  
NFO Cape Town:  
Claremont Central Building, 6<sup>th</sup> Floor, 6 Vineyard Road, Claremont, 7708

#### TELEPHONE NUMBER

+27 0860 800 900

#### WHATSAPP

+27 (0)66 473 0157

#### EMAIL ADDRESS

info@nfosa.co.za

#### WEBSITE

www.nfosa.co.za

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**FAIS OMBUDSMAN**

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The FAIS OMBUD deals with all disputes for all types of clients that arise out of the provision of advice, usually by the Intermediary, as dealt with by the FAIS Act.

<b>PHYSICAL ADDRESS</b>	125 Dallas Avenue Menlyn Central Waterkloof Glen Pretoria, 0010
<b>POSTAL ADDRESS</b>	PO Box 41, Menlyn Park, 0063
<b>TELEPHONE NUMBER</b>	+27 (012) 762 5000 or Sharecall 0860 324 766
<b>FACSIMILE</b>	+27 (012) 348 3447
<b>EMAIL ADDRESS</b>	info@faisombud.co.za
<b>WEBSITE</b>	www.faisombud.co.za

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**FINANCIAL SECTOR CONDUCT AUTHORITY**

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The body that administers the FAIS Act and other legislation relevant to insurance.

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**REGISTRAR**

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The body that ultimately deals with all regulation with a specific category of insurance e.g. Life or Non-life insurance.

<b>PHYSICAL ADDRESS</b>	Financial Sector Conduct Authority 41 Matroosberg Road Ashlea Gardens Pretoria, 0002
<b>POSTAL ADDRESS</b>	PO Box 35655, Menlo Park, 0102
<b>TELEPHONE NUMBER</b>	+27 (012) 428 8000 or Contact Centre 0800 20 37 22
<b>FACSIMILE NUMBER</b>	+27 (012) 346 6941
<b>EMAIL ADDRESS</b>	info@fsca.co.za
<b>WEBSITE</b>	www.fsca.co.za

**DETAILS ABOUT THE INTERMEDIARY (INSURANCE BROKERAGE)**

<b>COMPANY NAME</b>	
<b>REGISTERED ADDRESS</b>	
<b>TELEPHONE NUMBER</b>	
<b>FULL PHYSICAL ADDRESS OF OUR BRANCH DEALING WITH YOU</b>	
<b>TELEPHONE NUMBER</b>	
<b>FSP LICENCE NUMBER</b>	
<b>EMAIL ADDRESS</b>	
<b>REGISTRATION NUMBER</b>	
<b>VAT NUMBER</b>	

**HOW DO WE GET PAID FOR WHAT WE DO**

The Intermediary receives commission from the Insurer in the amount of 20% for Non-Motor, 12.5% for Motor and 17.5% for Top Up/Extended Liability, for placing insurance with them.

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**HOW TO LODGE A COMPLAINT**

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Contact your Intermediary (Insurance Brokerage)

## DETAILS ABOUT FRONTLINE, THE UNDERWRITING MANAGER

<b>COMPANY NAME</b>	Frontline Underwriting Managers (Pty) Ltd - Company Registration: 2008/005015/07
<b>REGISTERED ADDRESS</b>	BCX Building, 3 <sup>rd</sup> Floor, Office 2 106 Park Drive, St. Georges Gqeberha, 6001
<b>TELEPHONE NUMBER</b>	+27 (041) 373 0445
<b>FULL PHYSICAL ADDRESS OF OUR BRANCH DEALING WITH YOU</b>	BCX Building, 3 <sup>rd</sup> Floor, Office 2 106 Park Drive, St. Georges Gqeberha, 6001
<b>TELEPHONE NUMBER</b>	+27 (041) 373 0445
<b>REGISTRATION NUMBER</b>	2008/005015/07
<b>VAT NUMBER</b>	4350242386
<b>EMAIL ADDRESS</b>	customercare@frontlineum.co.za
<b>WEBSITE</b>	www.frontlineinsurance.co.za
<b>CONFLICT OF INTEREST GUIDELINES</b>	Should you require a copy of the Conflicts of Interest Guideline, please contact Frontline Underwriting Managers (Pty) Ltd.
<b>OUR LICENSE TO TRANSACT BUSINESS AS A FINANCIAL SERVICE PROVIDER</b>	FSP Licence Number: 40752 Categories of License: Non-Life Insurance, Personal and Commercial lines Exemptions applicable to us: AVIATION
<b>OUR INSURANCES IN PLACE THAT PROVIDE PROTECTION TO OUR CLIENTS</b>	Professional Indemnity Insurer: The Hollard Insurance Company Limited Fidelity Guarantee Insurer: The Hollard Insurance Company Limited Intermediaries Guarantee Fund Insurer: NOT REQUIRED
<b>OUR COMPLIANCE OFFICER</b>	Mandy van Coller Moonstone Information Refinery (Pty) Ltd mvancoller@moonstonecompliance.co.za

### HOW DO WE GET PAID FOR WHAT WE DO

The actual premium shown on your quote, renewal or policy schedule will be paid over to Fulcrum Collect (PTY) LTD, our collection agency, on behalf of Old Mutual Insure Limited. If there are any additional fees due to us or your intermediary (broker) these will be shown separately and specifically agreed by yourself. As Underwriting Managers of Old Mutual Insure Limited we are paid a fee by them for managing your insurances on their behalf.

Binder fee paid by Old Mutual Insure Limited is 11% (incl. Vat)  
Administration fee paid by Southern Cross Risk Management (PTY) Ltd is 5% (incl. Vat)  
Administration fee paid by Phishield UMA (PTY) Ltd is 3% (incl. Vat)

We do collect fees (if applicable) on behalf of your FSP/Broker.

#### Broker Fees / Non-standard Fees

The Broker has disclosed the fees paid by you over and above the insurance premium. The amount is reflected in the Premium Summary of your policy schedule and has been agreed and consented to by you.

#### Premium related information:

Payment frequency: <Monthly>  
Manner of payment: <Debit Order>

**Due date:** <2020-01-02>

#### Consequences of non-payment:

You agreed to pay the premium. The amount due, the frequency of payment and the due date are contained in the schedule. The consequences of non-payment are described in the policy wording.

If you do not pay the premium within 30 days of the due date, cover will be cancelled with effect from midnight on the day before the due date.

It is your responsibility to ensure that there is enough money in your bank account to cover the debit for the insurance premium;

You are entitled to a 15 days grace period in which to pay the premium (other than in the first month of insurance);  
If you do not pay the premium on or before the due date, cover will be cancelled from midnight on the day before

**Type of policy involved** Your policy is a Non-Life – Personal lines insurance policy

## HOW TO LODGE A COMPLAINT

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If you have a complaint about our service, staff or products sold to you, please contact the following person IN WRITING with full details of the problem you have encountered:

<b>COMPANY CONTACT</b>	James Bonner
<b>ADDRESS</b>	Postnet Suite #30, Private Bag X 40106 Walmer 6065
<b>EMAIL ADDRESS</b>	customercare@frontlineum.co.za

## VALUE ADDED PRODUCTS (VAPS) – not underwritten by FRONTLINE UNDERWRITING MANAGERS

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<b>PRODUCT</b>	FRONTLINE ASSIST
<b>COMPANY NAME</b>	Global Choices Lifestyle (Pty) Ltd (FSP No: 44544)
<b>ADDRESS</b>	204 Rivonia Road Block C, Ground floor, Morningside Sandton
<b>TELEPHONE NUMBER</b>	+27 0860 300 303
<b>UNDERWRITTEN BY</b>	Guardrisk Insurance Company Limited (FSP No: 75)

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<b>PRODUCT</b>	UMBRELLA LIABILITY
<b>UNDERWRITTEN BY</b>	AIG South Africa Limited (FSP No: 15805)
<b>ADDRESS</b>	88 Stella Road 1st Floor, Sandown Mews Sandown
<b>TELEPHONE NUMBER</b>	+27 11 551 8000
<b>ADMINISTERED BY</b>	Southern Cross Risk Management (Pty) Ltd (FSP No: 14874)
<b>ADDRESS</b>	Conduit Street Unit 44 C, Sandton View Office Park, Lyme Park Sandton
<b>TELEPHONE NUMBER</b>	+27 11 781 9916

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<b>PRODUCT</b>	PHISHIELD (Cyber Security / Funds Protection)
<b>UNDERWRITTEN BY</b>	Bryte Insurance Company Limited (FSP No: 17703)
<b>ADDRESS</b>	15 Biermann Avenue 5 <sup>th</sup> Floor, Rosebank Tower Rosebank
<b>TELEPHONE NUMBER</b>	+27 11 088 7000
<b>ADMINISTERED BY</b>	Phishield UMA (Pty) Ltd (FSP No: 46418)
<b>ADDRESS</b>	1210 Sunset Avenue Fourways View Office Park, Block C Fourways
<b>TELEPHONE NUMBER</b>	+27 10 312 5257

## DETAILS ABOUT YOUR INSURER AND FRONTLINE'S RELATIONSHIP WITH THEM

<b>COMPANY NAME</b>	Old Mutual Insure Limited - Company Registration: 1970/00619/06
<b>FSP LICENCE NUMBER</b>	12
<b>PHYSICAL ADDRESS</b>	Wanooka Place St. Andrews Road Parktown, 2193
<b>POSTAL ADDRESS</b>	PO Box 1120, Johannesburg, 2000
<b>TELEPHONE NUMBER</b>	+27 (011) 374 9111
<b>REGISTRATION NUMBER</b>	1970/006619/06
<b>VAT NUMBER</b>	4460101019
<b>EMAIL ADDRESS</b>	info@omnisure.co.za
<b>WEBSITE</b>	www.omnisure.co.za
<b>SHAREHOLDING</b>	Old Mutual Insure is owned by Mutual & Federal Investments Limited, a subsidiary of Old Mutual Life Assurance Co (SA) Ltd.
<b>LEGAL STATUS</b>	Old Mutual Insure Limited is a licensed Financial Services Provider (FSP) and Non-Life Insurer which underwrites and is authorised to issue Personal and Commercial lines policies. There are no restrictions imposed on this FSP licensing conditions. No exemptions exist.
<b>PROFESSIONAL INDEMNITY</b>	Old Mutual Insure Limited holds Professional Indemnity Insurance.
<b>CONFLICT OF INTEREST GUIDELINES</b>	Should you require a copy of the Conflicts of Interest Guideline, please contact your local Old Mutual Insure Ltd branch or access the policy using the link below. <a href="https://www.oldmutual.co.za/om-docs/blt08f4619f01d0e6ce/fais-conflict-of-interest-policy.pdf">https://www.oldmutual.co.za/om-docs/blt08f4619f01d0e6ce/fais-conflict-of-interest-policy.pdf</a>
<b>DO WE OWN MORE THAN 10% OF THIS INSURER?</b>	NO
<b>DO WE RECEIVE MORE THAN 30% OF OUR INCOME FROM THIS INSURER?</b>	YES – We are an Underwriting Manager for Old Mutual Insure Limited. Binder Fee paid by Old Mutual Insure Limited to our company is 11% (incl.Vat)
<b>CATEGORY OF PRODUCT AND/OR SERVICES WE ARE MANDATED TO SUPPLY ON BEHALF OF THE INSURER</b>	Products: All Non-Life Insurance Categories: Personal and Commercial Lines Services: Underwriting and Claims
<b>INSURER COMPLIANCE OFFICE</b>	Compliance Department PO Box 1120 Johannesburg 2000 +27 (011) 374 9111 – Ask for Compliance Department compliance@omnisure.co.za

### HOW DO THEY GET PAID FOR WHAT THEY DO

The actual premium shown on YOUR quote, renewal or policy schedule will be paid over (Net of Commission) to the insurer, Old Mutual Insure Limited.

### Broker Fees / Non-standard Fees

The Broker has disclosed the fees paid by you over and above the insurance premium. The amount reflected under “Your premium obligations as a policyholder” has been agreed and consented to by you.

### HOW TO LODGE A COMPLAINT

If you have a complaint about their service, staff or products sold to you that you have been unable to resolve with ourselves, please contact the following division IN WRITING with full details of the problem you have encountered:

<b>THEIR COMPLAINTS OFFICE ADDRESS</b>	Complaints Department PO Box 1120 Johannesburg 2000
<b>CONTACT EMAIL ADDRESS</b>	0860 634357 complaints@omnisure.co.za

## DETAILS ABOUT SASRIA

IF SASRIA (RIOT) INSURANCE HAS BEEN TAKEN OUT BY YOU OR IS INCLUDED IN THE POLICY AUTOMATICALLY YOU NEED TO KNOW THE FOLLOWING INFORMATION ABOUT SASRIA

<b>COMPANY NAME</b>	SASRIA SOC Limited – Company Registration: 1979/00287/30
<b>FSP LICENCE NUMBER</b>	39117
<b>PHYSICAL ADDRESS</b>	36 Fricker Road Illovo 2196
<b>POSTAL ADDRESS</b>	PO Box 653367, Benmore, 2010
<b>TELEPHONE NUMBER</b>	+27 (011) 214 0800 or 086 172 7742
<b>EMAIL ADDRESS</b>	contactus@sasria.co.za or mziwoxolom@sasria.co.za
<b>WEBSITE</b>	www.sasria.co.za
<b>SASRIA COMPLIANCE OFFICER</b>	Mr. Mziwoxolo Mavuso

## HOW TO LODGE A COMPLAINT

If you have any complaints about the Insurer regarding SASRIA cover, then you may contact:

<b>THEIR COMPLAINTS OFFICE ADDRESS</b>	The Compliance Office SASRIA SOC Limited PO Box 653367 Benmore 2010
<b>EMAIL ADDRESS</b>	complaints@sasria.co.za
<b>CLAIMS</b>	In the event of a claim, kindly approach your broker who will pass the claim onto Frontline Underwriting Managers (Pty) Ltd.

## ADDITIONAL RELEVANT INFORMATION

### YOUR INSURER, VIA THE UNDERWRITING MANAGER, UNDERTAKES TO:

Be the one who provides the reason for any claim that is repudiated  
Ensure that they write to you should they wish to cancel your policy and to give you at least 31 days notice of their intention to do so.

### IF YOU ARE PAYING YOUR PREMIUMS BY DEBIT ORDER:

The debit order may only be in favour of one person or entity.  
It may not be transferred without your approval  
The onus is on you to ensure that the debit order goes off your bank account each month.  
You are entitled to 31 days' notice of cancellation of the debit order.  
If you are paying for personal insurances:  
You are entitled to a period of 15 days grace in which to pay the premium (other than in the first month of insurance).  
Non-payment of premium will lead to the voiding of the policy and you will have no cover.

### IF YOU ARE PAYING YOUR PREMIUMS IN ANY WAY OTHER THAN MONTHLY:

You are only entitled to a 15 day grace period if the insurances are in respect of your personal insurances, otherwise; all premiums must be paid at inception or renewal date for the policy to be in force.

### IF YOU HAVE A CLAIM OR ARE INVOLVED IN AN INCIDENT THAT COULD LEAD TO A CLAIM:

You must advise your Insurance Broker immediately or Frontline Underwriting Managers (Pty) Ltd, preferably in writing.  
Your policy will contain conditions that relate to early reporting of potential claims and it is important that you do not breach this responsibility.

### IF ANY OF THE INFORMATION YOU GAVE US CHANGES:

You must advise us immediately – policy cover, premiums and terms are based on what you told the insurer. We need to advise them of any changes that could affect their view of you and your policy. It is your responsibility to ensure the correctness of the information. Failure to do so could mean that you will be prejudiced at the time of a claim.

### COOLING OFF RIGHTS:

If you have a yearly policy, you have 14 days to decide whether you wish to stop or continue with the insurance.

### CONSEQUENCES OF NON-PAYMENT OF EXCESSES:

Non-payment of excess applicable may result in delays in the processing and payment of the claim.

## WARNINGS:

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- Do not sign any blank or partially completed application form
- Keep all documents handed to you and make notes as to what is said to you
- Ask for a letter of representation from your adviser
- Do not be pressurised into buying the product
- Failure to provide correct or full relevant information may influence an insurer on any claims arising from your contract of insurance
- All material facts must be accurately and properly disclosed, and that the accuracy and completeness of all answers, statements or other information provided by or on behalf of the client, are the client's own responsibility.
- A material fact is one which is so important to Frontline Underwriting Managers **that if they knew** about it, Frontline Underwriting Managers may not have insured you or may have insured you on different terms and conditions
- It is important that you are aware of any amounts that you will be required to pay in the unfortunate event of a claim. Your policy schedules or wordings contain the amounts that you pay as a portion of a claim amount and your Financial Services Provider (your broker) can assist you with any queries you have in this regard.
- It is your responsibility to ensure that the level of cover provided by your policy is appropriate and meets your needs.
- If your premium is paid by debit order, the debit order form must be in favour of the party responsible for the collection of your premium and may not be transferred to another party without your approval or consent.
- The policy wording and schedule must be read as one document. If you need advice on any aspect of your policy, first amounts payable, claims procedures, or your responsibility to pay premiums, please contact your insurance broker as indicated on the accompanying schedule.

## SHARING OF INFORMATION:

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Insurers share information with each other regarding policies and claims with a view to prevent fraudulent claims and obtain material information regarding the assessment of risks proposed for insurance. By reducing the incidents of fraud and assessing risks fairly, future premium increases may be limited. This is done in the public interest and in the interest of all current and potential policyholders.

The sharing of information includes, but is not limited to, information sharing via the Information Data Sharing System operated by TransUnion on behalf of the South African Insurance Association. By the insurer accepting or renewing this insurance, you or any other person that is represented herein gives consent to the said information being disclosed to any other insurance company or its agent.

You are similarly giving consent to the sharing of information in regard to past insurance policies and claims that you have made. You also acknowledge that information provided by yourself or your representative may be verified against any legally recognised sources or databases.

We may use your information or obtain information about you for the following purposes:

- Underwriting
- Assessment and processing of claims
- Credit searches and/or verification of personal information
- Claims checks (ASISA Life & Claims Register)
- Tracing beneficiaries
- Fraud prevention and detection
- Market research and statistical analysis
- Audit & record keeping purposes
- Compliance with legal & regulatory requirements
- Verifying your identity
- Sharing information with service providers we engage to process such information on our behalf or who render services to us. These service providers may be abroad, but we will not share your information with them unless we are satisfied that they have adequate security measures in place to protect your personal information.

You may access your personal information that we hold and may also request us to correct any errors or to delete this information.

### Frontline's Information Officers:

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Information Officer: James Bonner            james\_b@frontlineum.co.za

Deputy Information Officer: Paul Myers    paul\_m@frontlineum.co.za

In certain cases you have the right to object to the processing of your personal information. You also have the right to complain to the Information Regulator, whose contact details are:

<http://www.iustice.gov.za/inforeg/index.html>

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Tel: 012 406 4818 Fax: 086 500 3351            Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

To view our full privacy notice, please visit Compliance / POPI on our website on [www.frontlineinsurance.co.za](http://www.frontlineinsurance.co.za).

## DETAILS REGARDING CONFLICT OF INTEREST

We make every effort to ensure that at all times we act in your best interests and in no way allow our own interests, potential or actual, to influence our objective performance and the delivery of unbiased and fair financial service to you.

In furtherance of this objective we want to ensure you fully understand the various interests we have, be they Ownership, Financial or Relationships with third parties. There are a number of entities with whom we can have a relationship of this nature and a summary of these is provided below:

### UNDERWRITING MANAGER / ADMINISTRATOR

We are appointed by the Product Provider (Insurer) to manage a specific type of product on their behalf. We are a licenced Financial Services Provider.

### FINANCIAL SERVICE PROVIDERS

They act as your broker/intermediary. They are also a Financial Service Provider (FSP). There may be circumstances where they have a relationship with another brokerage (FSP) that you need to be made aware of and you should be advised of such by your broker.

### PRODUCT PROVIDER

This is your Insurer.

Each of the above may well have companies that are associated with them with whom we have a relationship. These could be subsidiary or holding companies or certain natural persons such as spouse, children or parent. Where these relationships exist, you need to be made aware of them.

### DISTRIBUTION CHANNEL

These are arrangements with any of the above or combination of these that provide support or services to us in our role of providing a financial service to you.

### ANY OTHER PERSON

If there are any other persons that provide us with a financial interest as part of the delivery of the financial service.

## WHAT REPRESENTS AN OWNERSHIP OR FINANCIAL INTEREST?

### OWNERSHIP

Actual equity that was paid for

### FINANCIAL

Cash, or its equivalent, vouchers, gift service, advantage, benefit, discount domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration.

Any combination of these relationships and/or ownership or financial interests may present a potential conflict and as such we need to ensure you are aware of these.

We have established a Conflict of Interest Management Policy, where any conflicts are disclosed.

We also confirm that no staff are incentivised to give preference to any specific insurer and/or product and where incentives based on volume of business are in place these are supported by an assessment of the quality of the business sold and procedures followed.

We further undertake that no financial interest exceeding R1,000 per calendar year, will be received by any of our representatives or provided to any representative of the above listed entities.

## PLEASE NOTE THE FOLLOWING IN TERMS OF FRONTLINE'S CONFLICT OF INTEREST MANAGEMENT

DO WE OWN MORE THAN 10% OF THIS INSURER?	NO
DO WE RECEIVE MORE THAN 30% OF OUR INCOME FROM THIS INSURER?	YES – We are an Underwriting Manager for Old Mutual Insure Limited. Binder Fee paid by Old Mutual Insure Limited to our company is 11% (incl.Vat).
DO WE HAVE A RELATIONSHIP WITH ANY PRODUCT PROVIDER THAT PROVIDES AN OWNERSHIP OR FINANCIAL INTEREST?	NO
DO WE HAVE A RELATIONSHIP WITH ANY DISTRIBUTION CHANNEL THAT PROVIDES AN OWNERSHIP, FINANCIAL INTEREST OR SUPPORT SERVICE?	NO
DO WE HAVE A RELATIONSHIP WITH ANY OTHER PERSON THAT PROVIDES AN OWNERSHIP OR FINANCIAL INTEREST?	NO

A full copy of our overall Conflict of Interest Management Policy can be obtained from our offices upon written request to: [james\\_b@frontlineum.co.za](mailto:james_b@frontlineum.co.za)