



STEERCAPITAL

Conflict of Interest Policy
October 2025

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Introduction

Steer Capital is committed to act honestly, fairly, and in the best interests of our clients. This Conflict-of-Interest Policy explains how we identify, manage, and avoid conflicts of interest to comply with South African laws, including the Financial Advisory and Intermediary Services Act (FAIS).

What is a Conflict of Interest?

A conflict of interest happens when our interests (or those of our employees, representatives, or partners) could interfere with our duty to act in your best interest as a client. This includes situations where we might gain a financial or non-financial benefit that could affect our advice or services.

Our Commitment

We aim to:

- Avoid conflicts of interest where possible.
- Identify and manage any conflicts that arise.
- Disclose conflicts to you so you can make informed decisions.
- Treat all clients fairly and with integrity.

Our Commitment

We aim to:

- We regularly review our operations, including:
- Relationships with clients, employees, and third parties (e.g., brokers or product providers).
- Financial incentives, gifts, or benefits offered to or received by our staff.
- Ownership or personal interests that could influence our decisions.
- Situations where we or our staff might benefit at your expense.



Examples of Potential Conflicts

- Receiving commissions or incentives from product providers that could influence asset allocation decisions.
- An employee having a personal financial interest in a company we recommend to clients.
- Offering preferential treatment to one client over another.
- Accepting gifts or hospitality that could affect our objectivity.

How We Manage Conflicts

- To prevent or manage conflicts, we:
- Maintain a Conflict of Interest Register to track potential issues.
- Train our staff to recognise and report conflicts.
- Prohibit employees from using insider information or engaging in personal trading that conflicts with client interests.
- Ensure all fees, commissions, or benefits are disclosed to you before providing advice or services.
- Avoid or terminate relationships with third parties if they create unmanageable conflicts.
- Decline gifts or benefits over R1,000 per year from any single source, as per FAIS guidelines.

Disclosure to Clients

If a conflict cannot be avoided, we will:

- Inform you in writing about the conflict, including its nature and how we're managing it.
- Provide enough detail for you to make an informed decision about our services.

Employee Responsibilities

Our employees must:

- Act in clients' best interests always.
- Declare any personal interests, gifts, or benefits to our Compliance Officer.
- Avoid activities that could compromise their objectivity or our reputation.

Compliance and Monitoring

- Our Compliance Officer oversees this policy and ensures we follow FAIS and other regulations. We conduct regular reviews of our business practices.
- Update our Conflict-of-Interest Register as needed.
- Report any serious conflicts to the Financial Sector Conduct Authority (FSCA) if required.

Reporting Concerns

If you suspect a conflict of interest, contact our Compliance Officer:

Name: Elzabe Volschenck

Email: elzabe@zaconsult.co.za

Phone: 082 325 2747

You can also report concerns to the FSCA at www.fsca.co.za or the FAIS Ombud at info@faisombud.co.za.

Contact us

For questions about this policy, contact our Compliance Officer:

Email: info@steercapital.co.za

Phone: 087 16000 99

Address: 6 Kipling st, Dan Pienaar, Bloemfontein