JenBro Insurance

JenBro policy

# Conflicts of Interest Policy.

How we manage conflicts, gifts and hospitality so your interests come first.

## 01 Why this is important

This policy addresses the requirements of the Financial Markets Conduct Act 2013 (FMC Act). Its purpose is to ensure that conflicts of interest are identified and managed appropriately to prevent any negative effect on clients, loss of regulatory licenses and status, offences under law, or reputational damage.

In giving advice, a broker must give priority to the client's interests by taking all reasonable steps to ensure that the advice is not materially influenced by, firstly, the broker's own interests, and secondly, the interests of any other person connected with the giving of the advice.

Where there's a conflict of interest, the broker must give priority to the client's interests.

A conflict is a situation where:

- Some or all of the company's or an employee's interests are incompatible with, or differ from, some or all of a client's interests.
- The concerns or aims of two different parties are incompatible.
- Some or all of an employee's interests are in conflict with the company's interest.
- An employee is in a position to derive personal benefit from actions or decisions made in their official capacity.
- The giving or receiving of gifts may also create a conflict.

Brokers and employees have an obligation to ensure that their interests and the interests of the FAP are not placed ahead of the client's interests, especially where to do so would disadvantage a client or would negatively impact on the service a client receives. This policy seeks to address these issues.

## 02 Our policy

### We do this

- ✓ Inform clients about any actual or potential conflicts, even if these conflicts have not influenced the opinions or recommendations we may have given them.
- ✓ If we have any concern that an action might create a conflict, we do not take that action.
- ✓ Exclude ourselves from FAP business decisions which impact on our family members or associated entities.
- ✓ Obtain our FAP's prior written consent before engaging in any outside employment or role that has the potential to create an actual, potential, or perceived conflict of interest.
- ✓ Record all gifts and hospitality with a value of over $250 in the Gifts Register and disclose them to the Managing Director. No gifts or other benefits are to be accepted if they have a monetary value greater than $500 unless previously approved by the Managing Director.
- ✓ Record conflicts which have been identified on the Conflicts Register along with mitigating actions where required. The register is updated as required and reviewed annually.

### We don't do this

- × Accept any gifts or hospitality outside of approved limits without prior approval.
- × Solicit or request gifts, hospitality or favours from clients or any other parties that may result in a perceived or actual conflict.
- × Put ourselves in situations where we may derive personal benefit from actions or decisions made in our official capacity.

## 03 Implementation

- All brokers and employees receive induction and annual retraining on the contents of this policy.
- Actual or perceived conflicts are escalated to Managing Director for review.

## 04 Ensuring compliance

- Fostering a culture of compliance, which encourages open reporting of conflicts.
- The extensive use of disclosures, which allow clients to make informed decisions about a conflict and its potential impact on the product or service being provided to them.
- A designated compliance function with responsibility for monitoring compliance with relevant policies.
- Annual broker and employee attestations to policy adherence, including conflicts and Gifts Register review.

### Document history

| Version | Reviewed by | Approver | Review date | Key changes |
|---|---|---|---|---|
| 1024 | M Jensen | A Jensen | 2 October 2024 | Policy implementation |
| 1026 | AR Jensen | A Jensen | October 2026 | New brand layout, wording unchanged |

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