CONFLICT OF INTEREST MANAGEMENT POLICY

Gospel Gear CC t/a First Consult SA | Authorised Financial Services Provider | FSP 44958

Effective date: 17 September 2026

Purpose

This policy establishes principles and controls for identifying, avoiding, mitigating and disclosing conflicts of interest that may arise when Gospel Gear CC t/a First Consult SA renders financial services.

Policy statement

First Consult SA and its representatives must act honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry. A conflict must not be allowed to compromise the quality or objectivity of a financial service.

What may constitute a conflict

- A financial interest that could influence the objective performance of duties.
- An ownership interest or relationship with a product supplier or other person that could influence recommendations.
- A relationship, incentive, target or arrangement that creates an actual or perceived preference inconsistent with the client's interests.
- Any situation in which the interests of the FSP, a representative, an associate, one client or a product supplier compete with the interests of another client.

Management of conflicts

- Identify actual and potential conflicts as early as reasonably possible.
- Avoid the conflict where this is reasonably possible.
- Where avoidance is not reasonably possible, mitigate the conflict through controls, supervision, separation of duties, objective product-selection processes or other appropriate measures.
- Disclose material conflicts to the client in a clear, timely and meaningful manner where required.
- Decline or discontinue a transaction where the conflict cannot be managed to an acceptable level.

Financial interests

Representatives may only receive financial interests permitted under applicable law and the FSP's remuneration arrangements. Any provider incentives, fees, commissions or other benefits must not be allowed to override the duty to provide appropriate financial services.

Product-provider relationships

First Consult SA may have contractual relationships with multiple product providers. Provider relationships do not remove the obligation to consider the client's needs and the products that the FSP and relevant representative are authorised and able to advise on.

Gifts and benefits

Gifts, entertainment or benefits must not be accepted or provided where they could reasonably be expected to influence, or appear to influence, the objective rendering of a financial service. Records must be maintained where required.

Responsibilities

Key individuals and management are responsible for implementation and oversight. Representatives and staff must disclose potential conflicts internally and comply with the controls adopted by the FSP.

Accessibility

This policy is made available for public inspection through the First Consult SA website and may be requested from the FSP.

Document control: Prepared for website publication by Gospel Gear CC t/a First Consult SA. Review when business details, law, regulatory requirements or website functionality materially change.