



Financial Independence Conflicts of Interest Policy Gift Policy

Version 1.1

Our conflicts of Interest Policy

General:

To be aware of, and make the client aware of, areas of potential conflict. including but not limited to the following:

- Referring to a good friend
- Supplying business referrals to family
- Employing family

Conflicted remuneration:

Advisers at Financial Independence need to be aware of potential conflicts of interest which should be recorded and disclosed to the client. These things include but are not limited to the following:

- Extra commission earned from certain insurers.
- Recommending a product with an insurer that an adviser holds shares with.
- Receiving trips or gifts from an insurer
- Incentivising staff based on sales and commission.

How we minimize the impact of these conflicts within Financial Independence.

- Pay our advisers salaries, with no bonus or commission structure.
- Record and report on activity at Adviser meetings, not commission dollars
- Provide registers to log gifts, trips or incentives from insurers and monitor this.
- Disclose conflicts to clients via initial about us disclosure and more accurate disclosure on fees and remuneration when advice is given.

Any identified Conflicts of interest should be recorded on the register held in the Nas under Administration/ Life Advisers Info/ Conflicts and Gift Registers. Example below.

Gift and Policy:

From time to time the insurer may take us for a drink, lunch, dinner, send a gift or invite us to an event. In these instances, an adviser should record the event or gift in the register below.

The gifts and social incentive register will be reviewed by management to see if there are any patterns or red flags for conflict adviser behaviour.

Things to note when accepting a gift:

- What is the business expecting in return?
- Does the gift or outing place some sort of obligation on you?
- Could the adviser be influenced by it?
- Does it interfere with our professionalism, or open you to criticism?
- Is there impact to advice that would be given?

Gifts defined:

- Cash
- Vouchers
- Offers of hospitality, lunches, entertainment tickets, functions, discounted travel.
- Gifts such as chocolates, bottles of wine, present cards, jewellery, devices.

Acceptable gifts:

- Gifts up to the value of \$100
- Trips hosted by insurers that include learning modules and or training.
- Social events such as dinner or lunch out

Gifts to be approved by a senior manager:

- Trips out of town
- Gifts over \$100
- Tickets to events

The gift register should be completed for anything above the acceptable gifts, it is found in the Nas

Administration/ Life Advisers Info/ Conflicts and Gift Registers

Conflicts of Interest Register (example)

Financial Independence 2021					
Adviser name	Client name	Nature of conflict	Date notified	Is the conflict of interest ongoing?	Brief description on how conflict is being managed. Conflict approval or not?
Alana Collinson	Tim & Sally Smith	Alana has referred the Smiths to a Mortgage adviser who is also a close personal friend	15-Jun-21	Yes	All of Alana's referrals for mortgage advice are being allocated to the appropriate mortgage adviser according to the clients needs. Alana's friend the mortgage adviser is on our approved referral list. Conflict approved.
Matt Beattie	Tom and Judy Jones	An insurer has offered event tickets for the placing the clients business with them.	10-Jan-21	No	The conflict will be managed by not accepting the tickets. Conflict management approved.

Gift Register (example)

Financial Independence 2021						
				(example in red)		
Date (received/given)	Type (received/given)	Who Gave it (person and Organisation)	Who received it	Nature of relationship	Gift description	Approved by? (if required)
15-Jun-21	Received	Mark Armstrong Partners life	Matthew, Alana, Margi Financial Independence	Service provider	Trip to Auckland to Weta	Matthew Beattie
1-Jan-21	Given	Steve Freeman Financial Independence	Clients who referred - Tim Smith, Vicki Coleman, Sally Rush	Client	Bottle of Wine and Basket of food	Matthew Beattie & Steve Freeman

Approval and Version Control

Version	Date	Author	Description
1.1	08/06/2021	Alana Collinson	Update conflicts of interest to add gifts register

Authorised by:	Matthew Beattie
Date:	08/06/2021
Date for review	08/06/2023
Document Name:	Conflicts of Interest and Gift Policy