



THE SPIRIT GROUP (“THE GROUP”)

CONFLICTS OF INTEREST FRAMEWORK

1. Introduction

This document details the Conflicts of Interest Management Policy for the Group.

A short summary of this policy is included in the Group’s “Letter of Introduction” documents, issued and explained to clients at the beginning of the wealth management and advisory process. The full Conflicts of Interest Management Policy document is also available on request.

This policy applies to all applicable employees of the Group.

2. What is a Conflict of Interest and when may it arise?

A conflict of interest may arise where the Group, or one of its employees, is providing a financial service to its clients that may entail a material risk of damage to those clients’ interests and whether the company or its employee:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- Has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client’s interest in that outcome;
- Has a financial or other incentive to favour the interest of another client, or group of clients, over the interests of the client;
- Carries on the same business as the client; or
- Receives, or will receive, from a person other than the client, an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee disclosed for that service.

3. How we manage conflicts of interest

The following are examples of conflicts of interest and how we manage these conflicts:

- Contracts, proposed contracts and similar transactions or arrangements.
- A conflict of interest may arise where an employee has a direct or indirect interest in a transaction. This may be where employee, or the employee’s family has a connection to the other party to the transaction.
- The connection could arise from, amongst other things, a directorship, significant shareholding, employment or consultancy.

- The Group requires disclosure of any connection which could, or could be seen to, have the effect of compromising the judgment of any of our employees. Employees are required to notify the Group Director of Operations any such potential conflicts of interest, who will then decide if the employee can be involved in the transaction. The Group Director of Operations will also ensure that the relevant provisions have been met.

4. Gifts, Hospitality & Inducements

Inducements, gifts and hospitality are all issues that could lead to potential Conflicts of Interest. The Group has a strict policy regarding such issues, which is documented in the Company's Code of Conduct. All Employees must act with the highest standards of integrity to avoid any allegations of Conflicts of Interest.

Employees must not accept any cash payments, significant gifts or hospitality. Token gifts may be accepted, providing they have not been solicited, have not been given as a business inducement, is limited to Financial Interests that are allowed and will not compromise the Groups's integrity. Any such gifts are to be immediately reported to the Group Director of Operations. A register is kept of any gifts, or hospitality received.

Employees cannot attend hospitality events, without either their respective CEO/MD or Group Director of Operations approval. Where an invitation could be construed as being a business inducement, it must be declined.

5. The Group's policy

The Group expects all its employees to maintain the highest standards in carrying out their business activities, adhering to legislative requirements and our policies on business conduct. The Group expects its employees to act professionally, honestly and ethically in all their dealings with clients, colleagues and third parties. The company has a clear policy on Conflicts of Interest:

- Conflicts of Interest should always be avoided, wherever possible.
- Conflicts or potential Conflicts of Interest must always be disclosed. The Group will not tolerate non-disclosure by its employees.

Should a client require the full unabridged version of this document, please email ryan.magee@spiritinvest.com.

Document Control

Version	Date	Author	Change Status
2026	09/04/2026	Ryan Magee – Group Director of Operations / Key Individual / Chairman of Compliance Committee	Finalised.

Distribution

Names	Position	Review / Approval
Frits Rossouw	Compliance Officer – Compli-Serve	Approved.
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Document Repository

The latest approved version of this document is available on internal shared drives and repositories, as well as CRM platform; which is applicable to the business unit, subsidiary and/or division.

This Conflict of Interest Framework has also been made available on respective Group company websites.