

Conflicts of Interest Policy Summary

We are committed to maintaining the highest professional standards. To achieve this and ensure we treat all our customers fairly, we take appropriate steps to identify and prevent or manage conflicts of interest.

This document provides a summary of how we mitigate potential conflicts to maintain fairness, integrity, and trust, both within our organisation and in our dealings with you and other parties.

What is a conflict of interest?

A conflict of interest is a situation where there is a conflict between the interest of our company or certain persons connected to it and the duty our company owes to our customers. A conflict of interest may also arise between the differing interests of two or more customers to whom our company owes a duty.

Identifying Conflicts of Interest:

To identify potential conflicts of interest, we take into account whether any director, officer, employee or contractor of Tembo Savings or any person linked to Tembo Savings:

- Is likely to make a financial gain or may avoid a financial loss at a customer's expense;
- Has an interest in the outcome of a service provided to a customer, or transaction carried out on behalf of a customer, which is different from the customer's interest in that outcome;
- Receives a financial or other incentive to favour the interest of another customer or group of customers over the interests of a customer;
- Carries on the same business as a customer;
- Receive, or will receive, from a person other than a customer an inducement in relation to a service provided to the customer in the form of remuneration, goods or services.

Potential conflict of interest:

We have identified potential situations that may give rise to potential conflicts of interest. These situations include, but are not limited to, the following:

- Tembo Savings employees, personnel, or other related persons receiving gifts, entertainment or other monetary and non-monetary benefits from service providers or business partners, which could give rise to a conflict with the duties that we owe to our customers.

- Tembo Savings employees, personnel, or other related persons having personal or outside commitments (e.g. directorships) that may influence them to act in a manner that conflicts with the interest of Tembo Savings or its customers.

Managing potential conflict of interest

We seek to organise our business in such a way as to avoid conflicts of interest arising.

Where a conflict of interest is unavoidable, we have put in place procedures that are designed to ensure that the management of any conflict takes place in such a way that any customers are not disadvantaged. All of our employees are provided with training in these procedures and the standards of conduct expected of them. Our board of directors is responsible for ensuring that such procedures are appropriate and that employees act in accordance with them.

To identify and manage conflicts of interest, we have put the following measures in place:

Effective policies and procedures: Our management is responsible for ensuring that the policies and procedures are sufficient to identify and address a conflict of interest if it arises;

Internal training: our officers and employees are provided with appropriate training about conflicts of interest and the standards of conduct they must meet;

Conflicts Log: we maintain an internal log of each conflict of interest that arises. This records details of any conflicts, how they are monitored, as well as any solution which was applied to resolve the conflict and to prevent investor's interests from being disadvantaged;

Gifts & Hospitality Log: our personnel are required to declare gifts and hospitality offered and received over a certain nominal value, which are assessed and approved to ensure that it is appropriate and does not lead to a conflict of interest.

Protection of information: we have policies and procedures in place to keep information secure and to prevent unauthorised access or sharing of information

Separation of functions: where the way we are organised internally could create an internal conflict, we keep the affected business lines separate and set up individual management and reporting structures.

Telling you about conflicts of interest

Where we are unable to resolve a conflict of interest, we will inform you about this. This will allow you to decide whether it is appropriate for you to continue using our services.

Alternatively, we may decide in the circumstances that we cannot act on your behalf any further, in which case we will tell you this, and we will not accept any further instructions from you while we close your Account.