



INDEPENDENT INVESTMENT SOLUTIONS

TITLE: Treating Customers Fairly (TCF) Policy

VERSION: 201810

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1. Scope

Independent Investment Solutions (Pty) Ltd (Independent Investment Solutions) has adopted the FSCA's framework for Treating Customers Fairly (TCF). TCF in essence provides a framework within which we are required to conduct business, so as to ensure the supply of appropriate financial products and services to customers and enhanced transparency, resulting in improved customer confidence and relations.

This policy therefore in turn provides a framework to Independent Investment Solutions and to each employee for the fair treatment of our customers, and our management and employees are required to apply the principles of TCF in their daily tasks, irrespective of their roles.

2. Purpose

The purpose of this policy is to ensure that customers' expectations are appropriately met through sustainable business practices which are aimed at:

- Enhanced customer confidence;
- The supply of appropriate products and services; and
- Total transparency when dealing with customers.

3. Policy

At Independent Investment Solutions we understand that our customers are at the heart of our business and that the fair treatment of each and every customer is essential to our success.

As part of our overall approach we are fully committed to treating our customers fairly and as such we endeavour to consistently deliver fair outcomes to our customers and take responsibility for the company and staff.

We recognise that our employees, irrespective of their role, are critical to delivering a positive customer experience and ensuring our customers are treated fairly and our culture and values encourage and support our employees to deliver this.

As a Financial Services Provider, we take all regulatory requirements seriously, in particular, the requirement to treat customers fairly.

Our policy is based on the following fairness outcomes:

Outcome 1: Customers who are confident that they are dealing with companies where the fair treatment of customers is central to the company culture.

Outcome 2: Our products and or services marketed and sold in the market are designed to meet the needs of identified customer groups and are targeted accordingly.

Outcome 3: Customers are given clear and sufficient information and are kept appropriately informed before, during and after the time of contracting through our 4 P's and subsequent review processes, which is documented and implemented by all relevant staff.

Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

Outcome 5: Customers are provided with products that perform as we have led them to expect, and the associated service is both of an acceptable standard and what customers have been led to expect.

Outcome 6: Customers do not face unreasonable post-sale barriers to change the product, switch provider, submit a claim or lodge a complaint.

4. Procedure

Our TCF culture

Management and the Board

TCF is considered at the highest levels of our company. The subject of TCF is a standing item on the agenda of our structured bi-annual meetings of senior management.

Business strategy

TCF is considered at all stages and forms an integral part of any strategic planning processes.

Employee involvement

Employees are frequently encouraged through our regular branch and educational meetings to consider the TCF outcomes and continually provide feedback, concerns, observations or suggestions on how our treatment of our customers might be further enhanced.

It is of utmost importance for each employee to realise and acknowledge that, notwithstanding their specific roles within Independent Investment Solutions, their actions

and daily tasks will ultimately influence the customer's experience when dealing with Independent Investment Solutions, whether directly or indirectly.

Interaction with customers

We interact closely with our customers and target market. Our products, services and business are shaped by listening to our customers' needs and understanding what is important to them. As part of this process we become aware of any further needs that we can help with.

This is achieved through our standardised regular review process as well as through soliciting customer feedback on their experience in dealing with Independent Investment Solutions.

Decision making

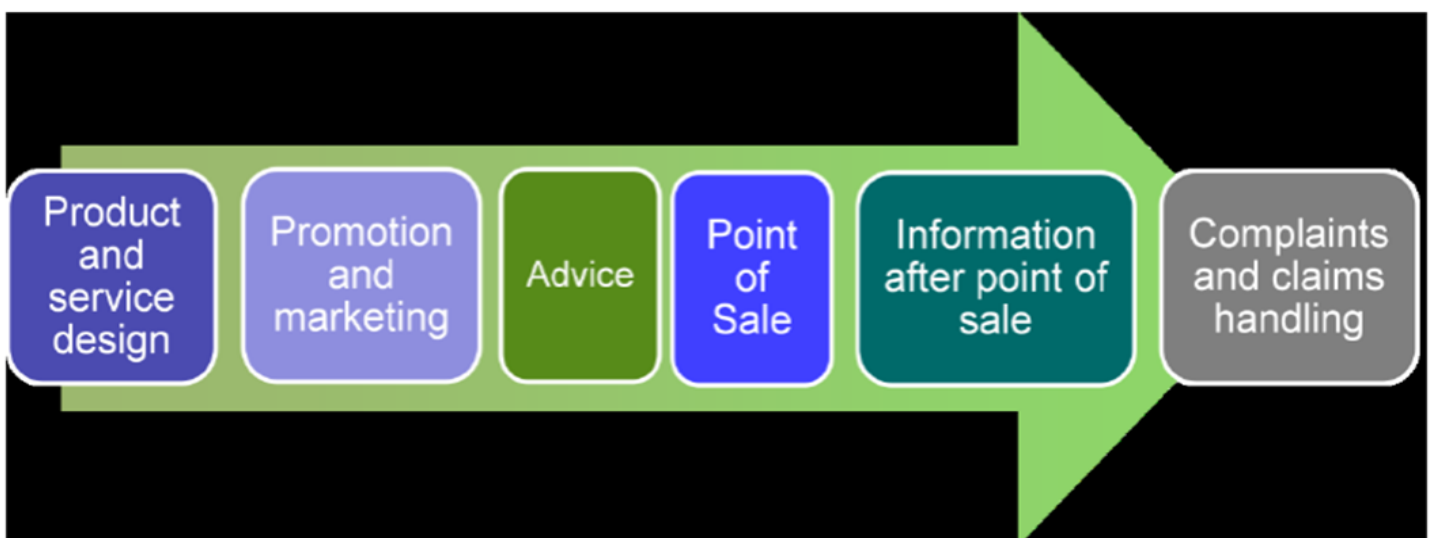
When making decisions, of any kind, we consider the impact on our clients first. Decisions are taken in the interests of the clients.

Continuous development

To ensure success and provision of excellent customer service, employees receive appropriate training and are aware that TCF is at the heart of Independent Investment Solutions' culture.

Our Products and Services

Management and employees are accordingly required to consider the above outcomes at all stages of their relationship with a customer and to demonstrate that they are consistently treating their customers fairly. The stages of a customer relationship can best be illustrated with reference to the typical product life cycle:



Applying the 6 fairness outcomes, in no particular order, to the stages of the typical product life cycle, provides some specific guidelines for the fair treatment of customers:

- **Product and service design:** Products and services – and the distribution strategies chosen to bring them to market – are designed and developed for specific target

markets, based on a clear understanding of the likely needs and financial capability of each customer group.

- **Promotion and marketing:** Products are marketed to specific target groups, through clear and fair communications that are not misleading and are appropriate to the target group.
- **Advice/Intermediary services:** Employees need to ensure that, where advice or an intermediary service is provided, advisers are fully equipped to provide such services in a manner suitable to the needs of the customer concerned, balancing the commercial objective of increasing sales with the objectives of TCF and avoiding conflicts of interest.
- **Point-of-sale:** Employees need to provide clear and fair information to enable customers to make informed decisions about transacting with the firm, its products and services. This means that product risks, commitments, limitations and charges must be transparent. Disclosure around bundled products must enable customers to understand the different components of the bundle.
- **Information after point-of-sale:** Employees need to provide customers with ongoing relevant information to enable them to monitor whether the product or service continues to meet their needs and expectations and provide acceptable levels of service for post-sale transactions or enquiries. Employees must also monitor and respond to changes in the wider environment that may affect products and impact on particular groups of customers.
- **Complaints and claims handling:** Employees need to honour representations, assurances and promises that lead to legitimate customer expectations. Legitimate expectations must not be frustrated by unreasonable post-sale barriers. There is a requirement for fair and consistent handling of claims and a mechanism to deal with complaints timeously and fairly. Employees should undertake to identify common underlying causes of complaints and take action to eliminate the root cause.

5. TCF Internal Reporting

The TCF performance measures to be discussed during management meetings are without limitation, the following:

Outcome 1 - TCF culture

Outcome 2 - Appropriately targeted design and marketing of products and services

Outcome 3 - Clear information

Outcome 4 - Suitable advice

Outcome 5 - Products perform as expected and acceptable service

Outcome 6 - No unreasonable post sale barriers

6. Consequences of Non-Adherence

The management and staff of Independent Investment Solutions is required to adhere to this policy and disciplinary action will be taken against individuals who do not comply with the requirements prescribed in this policy.

7. Training and Awareness

All staff will receive training on the outcomes in this policy and will also be given access to this policy.

8. Review

This policy will be reviewed as and when required, but at least annually, and amended if required.