



## TREATING CUSTOMERS FAIRLY (TCF) POLICY

## Introduction

At Commsure Financial Solutions (Pty) Ltd (“Commsure), we understand that the customer is at the heart of our business and that the fair treatment of customers is essential to our success. Our customers are our most valuable assets.

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. Our culture and values encourage and support our employees to deliver this.

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

Our TCF policy is based on the following principles (or “fairness outcomes”):

1. The fair treatment of customers must be central to the Commsure culture.
2. Products marketed and sold must meet the needs of identified customers and targeted accordingly.
3. Customers must be given clear information and be kept appropriately informed before, during and after the point of sale.
4. Where customers receive advice, this must be suitable and must take account of their circumstances.
5. Our products must perform as we have led our customers to expect, and our service must be of an acceptable standard and must be what our customers are expecting.
6. There must be no unreasonable post sale barriers to change product, switch provider, submit a claim or make a complaint.

Below we set out how we aim to ensure these principles are embedded in our approach to dealing with customers.

Process Step	How
1. TCF in the business's framework	<p><b>Business Plan</b></p> <ul style="list-style-type: none"><li>• Ensure TCF is incorporated into the business's:<ul style="list-style-type: none"><li>○ business plan</li><li>○ strategies and values/ethics statement</li><li>○ leadership and decision making</li></ul></li></ul> <p><b>Performance Management</b></p> <ul style="list-style-type: none"><li>• Ensure staff are trained to deliver TCF outcomes in performances</li><li>• Ensure tangible proof that staff have been trained or evaluated for TCF deliverables</li><li>• Ensure performance measurements incorporate measurement of TCF deliverables</li></ul> <p><b>Management Information (MI)</b></p> <ul style="list-style-type: none"><li>• Ensure MI collected is accurate, timely, relevant, and consistent through having proper procedures, processes, and controls in place</li><li>• Ensure MI is tangible and not just a statement that a process exists</li><li>• Ensure MI is identified, collected, and evaluated to monitor the success of a business's TCF strategy</li></ul> <p><b>Due Diligence on Product Provider and Service Providers</b></p> <ul style="list-style-type: none"><li>• Ensure that a proper due diligence is done on a product/service</li></ul> <p>Ensure that a proper due diligence is done when contracting with an unlisted business</p>

Process Step	How
<p><b>2. TCF in promotion and marketing</b></p>	<p><b>Due Diligence on Products (Know the Business's Product)</b></p> <ul style="list-style-type: none"> <li>• Ensure the products provided by Product Providers meet the business objectives and the needs of the prospective client base</li> <li>• Know the product features being supplied by the Product Provider</li> <li>• Know how the product features meet prospective client's needs</li> <li>• Know what risks are associated with the products and the market performance of the product</li> </ul> <p><b>Client Segmentation</b></p> <ul style="list-style-type: none"> <li>• Match the correct product to the target audience</li> <li>• Perform a suitability analysis: <ul style="list-style-type: none"> <li>○ conduct an overview of the business's client portfolio</li> <li>○ conduct an overview of the business's product portfolio</li> <li>○ match the needs and risks of each client group with a specific product</li> </ul> </li> </ul> <p><b>Marketing/ Advertisements/ Sales</b></p> <p>Ensure marketing is:</p> <ul style="list-style-type: none"> <li>• geared towards target clients</li> <li>• clear and not misleading (Consumer Protection Act)</li> <li>• in plain language and understandable to the client</li> </ul> <p>Ensure Advisors understand the products including the associated risks.</p>
<p><b>3. TCF at the point of sale</b></p>	<p>Control Process:</p> <p>Conduct Annual Reviews on:</p> <ul style="list-style-type: none"> <li>• Information provided to clients</li> <li>• Communication / Disclosure processes</li> <li>• Spot check on electronic information captured by staff</li> <li>• Ensure product risks, commitments, limitations, and charges are transparent</li> <li>• Ensure clients are given clear information</li> <li>• Ensure clients are kept appropriately informed before, during and after the time of contracting</li> </ul> <p><b>Information Management/ Disclosures/Communication</b></p> <p>Requirements:</p> <ul style="list-style-type: none"> <li>• ensure management approves information before distribution thereof</li> <li>• only contract with reputable businesses who comply with FAIS disclosure requirements (this will be revealed in due diligence investigation)</li> <li>• ensure information is understandable and relevant to target clients</li> <li>• ensure updates and/or changes to products are obtained from the Product Provider and distributed to clients and that all advisors received Product Specific Training on the changes</li> <li>• ensure that processes are in place to rectify incorrect information and/or disclosures by staff and/or marketing material</li> <li>• ensure that client contact details are constantly updated</li> </ul>
<p><b>4. TCF in the Advice Process</b></p>	<p><b>The Advice Process:</b></p> <ul style="list-style-type: none"> <li>• Ensure Advisor's provide advice that is suitable to the needs of the client concerned</li> </ul> <p>Ensure the process is evident from the advice record.</p> <p>The advice process should include:</p> <ul style="list-style-type: none"> <li>• establishment and defining of the professional relationship: <ul style="list-style-type: none"> <li>○ Letters of Introduction and Disclosures</li> <li>○ Service Agreement between the business and client</li> </ul> </li> <li>• gathering of relevant information and the determination of needs and objectives: <ul style="list-style-type: none"> <li>○ questionnaire/ interview that will provide both quantitative and qualitative information on the client</li> </ul> </li> </ul>

Process Step	How
	<ul style="list-style-type: none"> <li>• analysis and evaluation of the client's financial status: <ul style="list-style-type: none"> <li>○ processing and analyzing the information gathered</li> <li>○ client's financial position and current cashflow</li> <li>○ review of existing insurance policies and other legal papers</li> <li>○ determine the strengths and weaknesses in the client's finances</li> <li>○ evaluate the client's objectives in view of available resources, and economic conditions as they relate to future resources and cash flow for the client</li> </ul> </li> <li>• development and submission of a Financial Plan with recommendations and alternative proposals, where necessary</li> <li>• implementation of the proposed recommendations</li> <li>• monitoring of the recommendations and revision of the plan</li> </ul> <p>Review:</p> <ul style="list-style-type: none"> <li>• conduct Annual Reviews of Advisors (where applicable)</li> <li>• monitor service and advice given by Representatives</li> <li>• conduct a Competence Review, use the Competence Policy or process and the Register as guideline</li> </ul>
<p><b>5. TCF after point of sale</b></p>	<ul style="list-style-type: none"> <li>• Provide clients with ongoing relevant information</li> <li>• Provide acceptable levels of service for post-sale transactions or enquiries</li> <li>• Monitor and respond to changes in the wider environment that may affect products and impact on groups of clients</li> <li>• Ensure clients are provided with products that perform as the business has led them to expect</li> </ul> <p>Ensure services are both of an acceptable standard and what the client has been led to expect from the business</p> <p><b>MI should be extracted to measure product (product categorization):</b></p> <ul style="list-style-type: none"> <li>• performance</li> <li>• sales</li> <li>• complaints</li> <li>• risks</li> <li>• client behaviour regarding products</li> </ul> <p>Extract MI to <b>measure service</b> related to product:</p> <ul style="list-style-type: none"> <li>• ensure there are processes and procedures in place with regards to the financial service rendered</li> <li>• communicate processes and procedures to client</li> <li>• conduct an Annual Review on services rendered</li> </ul>
<p><b>6. TCF in complaints and claims handling</b></p>	<ul style="list-style-type: none"> <li>• Ensure the business honours representations, assurances and promises that lead to legitimate client expectations</li> <li>• Minimise unreasonable post-sale barriers</li> <li>• Ensure fair and consistent handling of claims</li> <li>• Develop a mechanism to deal with complaints timeously and fairly</li> </ul> <p>Identify common underlying causes of complaints and take action to eliminate the root cause</p> <p><b>Changing products/ Switching Providers</b></p> <ul style="list-style-type: none"> <li>• Ensure process complies with FAIS replacement product requirements and communicate it with the client</li> </ul> <p><b>Disclosures</b></p> <p>Clients to be informed:</p> <ul style="list-style-type: none"> <li>• if Product Provider declines a request to change a product with the reasons</li> <li>• of the risks associated with change, in reasonable time</li> </ul> <p><b>Claims and Disbursements</b></p> <p>Processes and procedures:</p>

Process Step	How
	<ul style="list-style-type: none"> <li>• document processes for the business regarding: <ul style="list-style-type: none"> <li>○ turnaround times</li> <li>○ progress of claims</li> <li>○ related charges, etc.</li> </ul> </li> <li>• inform clients of procedures for claims</li> <li>• <b>repudiations:</b> inform clients of why claims/disbursements are denied and/or relevant steps for review if any</li> <li>• <b>training:</b> staff should be trained on various product disbursement/claims processes</li> </ul> <p><b>Monitoring:</b></p> <p>MI should be collated and evaluated to assess:</p> <ul style="list-style-type: none"> <li>• service levels of Product Providers with regards to claims</li> <li>• whether the service has a bearing on the business's decisions on conducting business with a Product Provider</li> <li>• annual reviews of claims/ disbursements that will reveal whether Service Level Agreements are met and whether the client is receiving expected service</li> </ul> <p><b>Complaints Handling</b></p> <p>Ensure that it meets the FAIS and TCF requirements.</p> <p><b>Basic principles of complaint systems and procedures (S17 of GCoC):</b></p> <p>The FSP is required to maintain an internal complaints resolution system.</p> <ul style="list-style-type: none"> <li>• Document this system and procedures</li> <li>• Base it upon a complaints policy, which outlines a comprehensive procedure for complaints resolution</li> <li>• Ensure procedure is transparent</li> <li>• Ensure procedure is easy to use</li> <li>• Ensure resolution procedure is fair to the client, the FSP and staff</li> </ul> <p><b>Complaints – General rules (S19 of GCoC):</b></p> <p>The FSP must:</p> <ul style="list-style-type: none"> <li>• Request any client who has a complaint to lodge it in writing</li> <li>• Use the existing system to keep a record of all complaints for 5 years</li> <li>• Deal with complaints from clients in good time and in a fair manner</li> <li>• Start the complaint investigation and respond promptly</li> <li>• Tell the client what further steps to take under FAIS or any other law if the client is not satisfied with the resolution offered</li> </ul> <p><b>Complaint resolution – Minimum requirements (S18 of GCoC):</b></p> <p>The minimum requirements to ensure effective and fair resolution of complaints:</p> <ul style="list-style-type: none"> <li>• availability of adequate manpower and other resources</li> <li>• adequate training of all relevant staff</li> <li>• clear responsibilities for processing routine and serious complaints</li> </ul> <p>Follow up procedures to avoid repeat complaints and to improve service.</p>