

TREATING CLIENTS FAIRLY POLICY

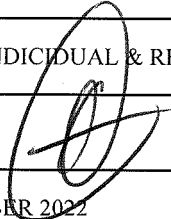
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Policy Owner	VERRYN MACDONALD INVESTMENTS C.C

POLICY STATEMENT

The Key Individual and Representative, its employees, , product providers and any other persons acting on behalf of the FSP are required to familiarise themselves with the policy's requirements and undertake to comply with the stated processes and procedures.

POLICY ADOPTION

By signing this document, I authorise the organisation's approval and adoption of the processes and procedures outlined herein.

Name & Surname	CRAIG MACDONALD
Capacity	KEY INDIVIDUAL & REPRESENTATIVE
Signature	
Date	OCTOBER 2022

Verryn Macdonald Investments c.c respects the Regulator's mission to maintain a sound financial investment environment in South Africa and acknowledge its mandate to promote the:

- fair treatment of consumers of financial services and products
- financial soundness of financial institutions
- systematic stability of financial industries
- integrity of financial markets and institutions

The FSP welcomes the TCF initiative and commits itself to align the FSP's organisational culture and business processes in such a way as to ensure that:

- our clients are at all times confident that their fair treatment is central to our corporate culture
- any products and services marketed and sold by us in the retail market are designed to meet the needs of identified client groups and that any related targeting of our clients are done so in accordance with this standard
- our clients are at all times provided with clear information and are kept appropriately informed before, during and after the point of sale
- where our clients receive advice, that the advice is suitable and takes into account the individual client's circumstances
- our clients are provided with products that performs as we have led them to expect and that any associated services is also of the standard that we have led them to expect
- our clients do not face any unreasonable post-sale barriers should they wish to change their products, switch to another FSP, submit a claim or submit a complaint about our services

POLICY STATEMENT

It is our committed objective to ensure that all our clients or potential clients can be confident that they are dealing with an FSP where the fair treatment of clients is central to the corporate culture.

We use our best efforts to ensure that at all times we, our staff members and representatives render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry.

Delivery of the TCF outcomes is a core feature of the FSP's stated values, code of conduct and ethics policy, and is embedded throughout the FSP's DNA

PROCEDURES IMPLEMENTED IN ORDER TO ACHIEVE POLICY OBJECTIVES

Leadership

TCF is a standing item on the governing body of the FSP's meeting agenda where the FSP's approach to TCF is analysed and discussed.

Key Individual has adopted TCF deliverables and have been allocated specific responsibilities in terms thereof. Senior management in all areas of the FSP that contribute to the rendering of financial services to clients (whether directly or indirectly), understand their respective roles in delivering TCF outcomes to those clients.

Senior management conducts regular reviews of the main business processes with a view to identifying areas that do, or may, require improved TCF deliverables. Explicit allowance has been made to allow for and consider TCF implications and deliverables during the strategic planning process of any new strategy or change in existing strategy.

Adherence to the TCF deliverables is monitored as part of our Compliance Monitoring Programme. We ensure on a annual basis that

accurate, meaningful and timely Management Information has been produced during the period and that senior management acts accordingly.

Decision Making

All requests by the FSP's representative for the approval of service innovations include due consideration of the possible impact it may have on TCF outcomes.

The organisation has established accessible forums or structures through which staff members and management are able to debate TCF related matters and refer any TCF questions or concerns to the Key Individual .

Governance and Controls

Oversight and monitoring of TCF delivery has been explicitly assigned to the governance and control structures of the organisation tasked with risk management and the compliance function.

Procedures have been implemented to ensure formal and regular reporting to Key Individual on the progress in achieving TCF deliverables across all of the organisation's activities and functional departments.

The management of TCF and market conduct risks are formally included in the risk management framework of the FSP and are regularly monitored and supervised by the Key Individual and Representative.

Employee Participation

All staff members roles require delivery of TCF outcomes have been identified.

Performance evaluation criteria include TCF objectives and are carefully applied at all levels of staff, irrespective of their position within the FSP

Staff members undergo training on TCF principles and deliverables by way of induction and annual training, as to familiarise and to act as a refresher of the TCF principles as set out in this policy.

Reward

Remuneration is meaningfully linked to the achievement of TCF objectives, at all levels and all reward and recognition processes have been revised in the light of TCF objectives, and is aimed at encouraging performance

Management Information

Processes are in place to identify staff training needs and to align performance management measures.

Communication

We communicate transparently with our stakeholders (including the Regulator) on our progress in achieving TCF outcomes.

We make information regarding our progress in achieving TCF outcomes publicly available.

THE FSP CLIENT CATEGORIES

Our clients can typically be grouped into three broad categories:

- Low sophistication: Relatively inexperienced groups with a high level of dependence
- Moderate sophistication: General client groups falling into the mass market
- High sophistication: Investment groups who have expertise

PRODUCT APPROVAL AND SELECTION PROCESS

Our product approval and product selection processes also include the careful consideration of the elements listed below:

When designing a product or selecting a product to distribute or to administer, we identify the particular client groups for which the product can be considered suitable whilst taking into consideration needs and various risks factors.

We obtain information from the product providers regarding client groups in respect of which the product is regarded as most suitable.

We provide our staff members and representatives with information and guidance to determine the client group/s in respect of whom the products are best suited.

Clients are provided with clear information and are kept appropriately informed before, during and after the point of sale.

We assess the clarity, appropriateness and fairness of product information provided to clients, whether such information is produced by ourselves or by others and all product related information requires sign-off by senior management.

Before any product information is issued, it is carefully verified to ensure that the content will be clear and understandable by the target audience and client group.

We have implemented appropriate risk mitigation procedures that are designed to address any inaccurate, unfair or misleading information about our products or services that may be provided to clients by third parties.

We have implemented appropriate procedures to ensure that any information we provide regarding any other party's products or services is accurate, clear, and fair and is not misleading.

We have implemented appropriate procedures to ensure that we are able, as far as reasonably possible, to rectify any situation where it becomes apparent that any product information already in circulation (whether produced by the FSP or not) is inaccurate, unclear, or unfair or is misleading.

We monitor and act on feedback, complaints and suggestions received from clients, staff members or any other parties that communicate the need for improvement in product information.

We have a process in place to ensure relevant and adequate product information is provided to our clients, whether by our own staff members / representatives at an appropriate time to enable them to make an informed decision as to whether to enter into the relevant contract.

We provide existing clients with a portfolio summary at least once a year that identify any financial products that have been acquired by that client and where such products are still in existence. Such statements provide brief current details (where applicable), of:

- any ongoing monetary obligations of the client in respect of such products;
- the main benefits provided by the products;
- where any product was marketed or positioned as an investment or as having an investment component, the value of the investment and the amount of such value which is accessible to the client; and
- any ongoing incentives, consideration, commission, fee or brokerage payable to ourselves in respect of such products.

A documented Record of Advice, as provided for in section 9 of the General Code of Conduct (Board Notice 80 of 2003 as amended), is maintained for each and every transaction entered into with any client and documented with in individual client files. A copy of the applicable record of advice is handed to each client upon completion of the transaction.

We ensure that clients are informed of any recent or pending changes to our products, contractual events or any actions required from them, and that such information is provided in sufficient time to enable any client to reasonably respond to or act on that information.

To the extent applicable, we control the accuracy and quality of any once-off or non-standard product information provided by staff members or representatives to clients or potential clients.

We maintain up-to-date contact details of all our existing clients.

We ensure that clients have current and accessible contact points if they need product or service information or need to get in contact with our functional departments for any reason.

We have accurate, retrievable, secure records of all product information we have provided to clients and any other material.

Where clients receive advice, the advice is suitable and takes account of their circumstances

BEFORE ADVICE IS GIVEN BY THE FSP

Prior to making any decision to market a particular product, we assess whether or not we have the appropriate skills and business processes in place to render the appropriate financial service and that the particular product will be suitable for the target market and client concerned.

Prior to contracting with any product supplier to market their products, we conduct an appropriate level of due diligence to satisfy ourselves that their products and service levels are likely to meet our clients' reasonable expectations.

We insist that product suppliers provide our representatives with adequate training on the specific products we market to enable them to render suitable financial services on those products.

We have measures in place to establish and monitor incentivising of representative when marketing and selling of a specific product of a supplier.

We have implemented procedures that ensure that all representatives, prior to providing advice to a client:

- take reasonable steps to seek from the client appropriate and available information regarding the client's financial situation, financial product experience and objectives to enable the provider to provide the client with appropriate advice;
- conduct an analysis, for purposes of the advice, based on the information obtained;
- identify the financial product or products that will be appropriate to the client's risk profile and financial needs, subject to the limitations imposed on the provider under the FAIS Act or any contractual arrangement;
- take reasonable steps to establish whether the financial product identified is wholly or partially a replacement for an existing financial product of the client and if it is such a replacement, follows all the required disclosure procedures; and
- take reasonable steps to ensure that the client understands the advice and that the client is in a position to make an informed decision.

ADVICE GIVEN BY THE FSP

In order to ensure that the highest level of financial services are rendered to our clients and potential clients, we identify any risk of inappropriate financial service and we monitor feedback or complaints received from clients, product suppliers or other third parties regarding the quality of financial service they may have received from our representatives.

We have implemented procedures to identify instances where our representatives have provided inappropriate advice or misleading information to clients and have implemented further procedures that seek to mitigate the risk to clients should such events occur.

We monitor potential TCF indicators such as insurance claims experience, product retention / early termination data, investment portfolio switching, type and frequency of product changes in relation to the clients associated with our representatives, in order to identify and mitigate risks of any inappropriate financial services or poor client outcomes attributable to the representatives concerned.

We provide product suppliers and other third parties in the client value chain with feedback in relation to any aspects of their products or services which inhibit our ability to provide suitable advice or the delivery of other TCF outcomes to clients.

We have controls in place to identify and address any conflicts of interest between ourselves, our clients and product providers whose products we market.

Clear TCF measures are included in the criteria that our representative is required to satisfy in order to meet incentive or remuneration targets.

There are clear agreements between ourselves and any product suppliers whose products we market, that set out our respective responsibilities in relation to providing clients with appropriate financial services, information and service support. These agreements are structured to ensure that clients understand who they should look to in relation to different aspects of the financial products or

Clients are provided with products that perform as the FSP has led them to expect, and the associated service is of an acceptable standard and as they have been led to expect

Our point-of sale and information post-sale, include the careful consideration of the elements listed below:

Processes are in place to mitigate the risk that products and services are unable to satisfy the reasonable expectations of clients.

We analyse the product retention / portfolio switching / early termination behaviour of our clients to identify the possible risk that products or services are not meeting expectations.

Processes are in place to alert clients to the risks resultant from their actions (such as early termination of a product, non-payment of contributions, investment portfolio switches, and benefit reductions) in reasonable time for them to respond to or act on the information.

Processes are in place to alert clients to the risks of non-action on their part, such as a failure to review insurance cover needs, investment goals, risk profiles and beneficiary nominations.

We have clear service standards in place for client service processes and communicate these to our clients.

We monitor and act on feedback, complaints and suggestions received from clients and staff members that identify the need for improvements in our services or service standards.

Where it becomes apparent that products are not performing or are unlikely to perform as clients have been led to expect, we have implemented processes to mitigate the risks to our clients.

Clients do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint

The FSP is committed to ensuring that clients do not face unreasonable post-sale barriers when changing products, switching providers or when making complaints, and consider all client criticism, whether positive or negative, as a critical feedback mechanism.

CHANGING PRODUCTS

We inform our clients (in good time, not only on request) of the types of permissible changes they may make to their products if their individual needs or circumstances change and of any important limitations on their ability to access funds or to make amendments to any product.

When we become aware of any changes to a client's needs or circumstances (including affordability difficulties), we inform such client of possible product changes that are available to them in order to meet their changed requirements.

We have clear service standards in place for processing product changes (including instances where the request needs to be referred to another party for processing) and communicate these standards to our clients.

Where a request for a product change is declined by any party in the value chain, we provide the client with clear reasons for the decision.

When we receive a request to change a product (whether directly or through another party) we inform the client of any potential risks associated with the change, in reasonable time for them to respond to or act on the information.

SWITCHING PROVIDERS

We have clear service standards in place for processing switches to other providers and communicate these to our clients.

When we receive a request to switch providers (whether directly or through another party) we inform the client of any potential risks associated with the switch.

CLAIMS AND DISBURSEMENT HANDLING

We inform our clients of the process that must be followed in order to submit a claim or a disbursement request and what information will be required in order to process a claim or a disbursement request.

We inform our clients of our service standards when processing claims and disbursement requests.

Once a claim has been received, we keep clients/members informed of the progress.

Where a claim is declined, we provide the client/member clear reasons for the decision, with supporting evidence, where relevant, and the steps available to the client in order to review the decision (if any).

COMPLAINTS HANDLING

We have a strong complaints management policy in place, record keeping and root cause analysis process, and have

We consider the nature of complaints received and the complaints handling performance history of different product suppliers when deciding on whether or not to enter into a business relationship with a particular product provider

We consider the nature of complaints received and the complaints handling performance history of different product providers when recommending a financial product to our clients.