TREATING CLIENTS FAIRLY POLICY

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Responsible Business Unit	Compliance – Vernon Cloete

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COMPLIANCE AND RISK MANAGEMENT

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POLICY STATEMENT

- Any reference to the “organisation” shall be interpreted to include the “policy owner”.
- The organisation’s governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation 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	VERNON CLOETE
Capacity	KEY INDIVIDUAL / DIRECTOR
Signature	
Date	2021

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1 TCF CHAMPION

- The FSP has appointed a TCF (Treating clients fairly) Champion as part of its commitment to treat its clients fairly. The appointment of the TCF Champion is confirmed in Annexure C hereto.
- The general duties of the TCF Champion include:
  - To be actively involved with embedding the TCF principles into the organisation.
  - To help instilling a culture where the fair treatment of clients is embraced and adopted.
  - To assist the governing body of the organisation to implement and adopt business processes aimed at ensuring that the organisation is at all times achieving the outcomes of TCF as set out in this document.
- The TCF Champion has the authority to approach and speak to staff members at all levels about the delivery and achievement of TCF outcomes.
- The TCF Champion need not have any specific qualifications but must have a thorough knowledge of the organisation's functional departments, business processes and the principles associated with treating clients fairly.

2 THE SIX TCF OUTCOMES

- The FSP 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
- To this end 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 the six outcomes of TCF are at all times achieved.
- The six outcomes of treating clients fairly will be achieved by our organisation through ensuring 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

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- 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

3 OUTCOME 1

Clients are confident that they are dealing with firms where the fair treatment of clients is central to the firm culture.

3.1 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

3.2 PROCEDURES IMPLEMENTED IN ORDER TO ACHIEVE POLICY OBJECTIVES

3.2.1 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.

- Senior management 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 monthly/ quarterly/ bi-annual basis that accurate, meaningful and timely Management Information has been produced during the period and that senior management acts accordingly. Existing tests within our Compliance Monitoring Programme aid us in demonstrating our level of compliance and adherence to the TCF outcomes. Where there are TCF action points, these will be documented and carried over to a further (minuted) meeting.

3.2.2 Decision Making

- All requests by the FSP's governing body for the approval of product and service innovations or project expenditure, 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 governing body or appointed

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risk committee.

3.2.3 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 the governing body and senior management 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 organisation and are regularly monitored and supervised by the governing body and independently monitored by a Compliance Officer.

- Procedures have been implemented for identifying and reporting (at organisation-wide level) TCF risks or failures to senior management and the governing body.

- There is ongoing evaluation of whether the organisation's governance framework as a whole has been effective in achieving TCF outcomes.

- We have mechanisms in place to monitor and respond to changes in the broader environment such as economic and regulatory developments to enable us to proactively identify TCF related risks.

3.2.4 Employee Participation

- All staff members (including senior management) whose roles require delivery of TCF outcomes have been identified.

- Performance evaluation criteria incorporate TCF objectives and are rigorously 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.

- Recruitment processes have been revised to ensure staff in relevant positions will have the necessary skills to achieve the outcomes of TCF.

- All staff members are aware of the requirement to treat clients fairly. This Policy has been circulated to all staff members and staff members are encouraged to make suggestions to our TCF Champion on how the treatment of our clients might be further enhanced.

3.2.5 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 without negatively impacting the treatment of clients.

- Employment and service agreements have been amended and updated to permit the imposition of meaningful consequences (such as retraining, re-assignment or disciplinary action, as appropriate) for staff members or

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management who do not achieve agreed TCF deliverables.

3.2.6 Management Information (MI)

- Existing MI measures have been reviewed to determine which are useful for TCF monitoring and new measures have been identified where necessary (See Annexure B).
- Processes are in place to:
  - collate and summarise TCF related MI in such a way as to present a meaningful picture of organisation-wide TCF progress;
  - analyse and act on MI findings to improve TCF outcomes for our clients; and
  - identify staff training needs and to align performance management measures.

3.2.7 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.

4 OUTCOME 2

Products and services marketed and sold in the retail market are designed to meet the needs of identified client groups and are targeted accordingly.

We develop and provide advice and certain intermediary services on products that fall within the categories and sub-categories of the financial products listed in Annexure A.

4.1 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

4.2 PRODUCT APPROVAL AND SELECTION PROCESS

Our product approval and product selection processes include senior management confirmation that a product adequately meets the outcomes of TCF and that any such product will perform as clients are led to expect.

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.

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- We obtain information from the product supplier 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.

- In determining whether our distribution and administration methods are suitable for the product and target market, we take into account all known and foreseeable risks associated with the product.

- We have measures in place to identify and mitigate risks that a product or service may pose to particular client groups.

- When development and management of products and services are done, we have measures in place to ensure that the requirements and expectations of the identified client group, including former members of the identified client group, is met.

- When approving or selecting any product for distribution:

  - we assess the suitability of any promotional or other material that has been designed for the identified client group, and take into consideration complaints and service call data available

  - we assess the suitability of any related and optional (bundled and "add-on") products or services for the identified client group

- Moreover, should any product be selected that includes bundled or “add-on” products or services, we confirm that there are processes in place to ensure the fair treatment of clients or members with regard to such bundled and "add-on" products or services, including ensuring that these products or services are appropriately targeted to the needs of client groups for which they are provided.

- We have measures in place to insure the where bundling or “add-on” of products / services, or incentives to funds occur, it does not result in needless products or services to the client group.

- We have measures in place to evaluate the client groups’ financial understanding of products or services offered or provided to them.

- We have measures in place to ensure that the client group has enough information available to them to make an informed decision in selecting products or service.

- We track sales to determine whether products are in fact sold to the identified client groups.

- We have processes in place to mitigate risks where it becomes apparent that the product or the distribution or the administration method, or any combination of these elements, was not suitable for the identified client group, or that the product has been distributed to inappropriate client target groups.

5 OUTCOME 3

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.

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- Before any product information is issued, it is carefully tested 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 regularly review standardised product information we use (whether produced by the FSP or not) to ensure that it remains accurate, clear and appropriate to the applicable client groups.

- 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 or by other parties, at an appropriate time to enable them to make an informed decision as to whether to enter into the relevant contract.

- We provide all existing clients with written statements 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

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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.

6 OUTCOME 4

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

6.1 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 controls in place to prevent our representatives from rendering any financial services to any client in respect of products for which adequate product training has not been provided.

- Prior to contracting with any product supplier to market their products, we make appropriate arrangements to ensure that the FSP and our representatives will have reasonable access to any product information required from the product supplier to enable all parties to render suitable and appropriate financial services to clients and potential clients,

- We have procedure in place to establishing whether there are comparable products on the market, to that offered by a supplier.

- 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.

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6.1 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 suppliers whose products we market.

- Clear TCF measures are included in the criteria that our representatives are 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 service provided to them.

- We have controls in place to identify and act on instances where our representatives have provided advice which they are not authorised to provide, either in terms of their specific contract or mandate with us and/or with any product supplier, or as a result of non-compliance with our FAIS licence conditions or other legal requirements.

- We have a policy in place for fair compensation of clients who have been financially prejudiced as a result of any inappropriate financial service rendered by our representatives.

- We monitor the published decisions of the FAIS Ombud, communications and guidance from the Regulator and any other relevant information sources in relation to advice practices, to ensure that our controls and practices in relation to this TCF outcome remain relevant and effective.

7 OUTCOME 5

Clients are provided with products that perform as the firm 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.

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- 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 research and test our service standards to determine whether they are in line with client expectations.

- We monitor and act on feedback, complaints and suggestions received from clients, intermediaries 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.

- We have adopted “Management Information” on client expectations (See Annexure B).

- Processes are in place to protect the confidentiality of all client information.

The procedures listed below are for third parties such as product suppliers, Category II, IIA or III FSPs, binder holders, reinsurers, administrators and other outsourced service providers that are part of the overall value chain in providing products or services to our clients. These procedures do not apply to the relationship between product suppliers and Category I FSPs.

- We have clear agreements in place regarding the division of responsibilities between the various parties to ensure the fair treatment of clients.

- We conduct an appropriate level of due diligence on any such third party, before dealing with them, to satisfy ourselves that TCF outcomes are adhered to and that the products and / or service levels, as the case may be, are likely to be as clients (and we) have been led to expect.

- We regularly monitor the third party's client treatment standards, including how the third party meets client expectations.

- Processes are in place to mitigate the risks to our clients where it becomes apparent that a third party's products are not in fact performing as clients (and we) have been led to expect by that third party or where it becomes apparent that service from the third party is not of an acceptable or agreed upon standard.

- We have full and unrestricted access to information held by the third party in relation to our clients’ Management Information.

8 OUTCOME 6

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

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mechanism.

○ 8.1 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.

○ 8.2 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.

○ 8.3 CLAIMS AND DISBURSEMENT HANDLING (BINDER HOLDERS: LONG-TERM AND SHORT-TERM INSURANCE ONLY)

- We test our claims and/or disbursement handling processes to ensure that it is suitable for the product and target client group concerned.

- We inform our clients (not only on request or at claim stage) 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.

- We inform clients prior to contracting, of the circumstances under which claims or disbursement requests will not be processed and explain the client's obligations in this regard.

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

- Where a claim is repudiated, wholly or partially, or a disbursement request 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).

- We consider the client's reasonable benefit expectations and our TCF objectives before making a decision to repudiate / decline a claim or disbursement request.

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- We have specific training in place for claims and disbursement processing staff (including on TCF).
- We consider the claims repudiation experience and quality of claims handling of different insurers when recommending an insurer to clients.
- We analyse types of claims and claims repudiation experience of our different representatives to identify any risk of mis-selling.

8.4 COMPLAINTS HANDLING

- We test our complaints process to ensure it is accessible and appropriate to our client group/s.
- We have a robust complaints management, record keeping and root cause analysis process, and have devoted sufficient resources to ensure effective complaints handling when needed.
- We inform clients (before complaint stage) of the process that must be followed in order to submit a complaint, and of the various options available for further recourse if the client is dissatisfied with the outcome of the complaint.
- We benchmark our complaints data (for example, complaint volumes, resolution rates, referrals to Ombud schemes) against competitors.
- Once a complaint has been received, whether we are dealing with the complaint ourselves or where we have referred the complaint to another party, we keep clients informed of its progress (including the contact details of the person responsible for processing the complaint)
- When responding to a complaint, we provide clear reasons for our response (including where the response is favourable to the client), with supporting evidence where relevant.
- Where a request for redress is declined, wholly or partially, we inform the client of the steps that may be followed in order to have the decision reviewed.
- We have clear service standards in place for processing complaints and we communicate such standards to our clients.
- We have specific staff training in place for complaints handling
- Complaints processes are structured in such a way as to ensure that there are no conflicts of interest and that all decisions are based on objective facts and criteria.
- Complaints processes are structured in such a way as to ensure that complaints of a similar nature have a similar outcome.
- Follow-up processes are in place to determine the client satisfaction levels of complaints that have been finalised.
- Processes are in place to ensure consistency in complaints handling. We have a policy in place for fair compensation of clients who have been financially prejudiced by unfair treatment, which is not limited only to those clients who complain.
- We analyse complaints to identify any risks of mis-selling (whether by our own representatives or not).
- 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 supplier

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- We consider the nature of complaints received and the complaints handling performance history of different product suppliers when recommending a particular product supplier or financial product to our clients.

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9 ANNEXURE A: AUTHORISED FINANCIAL PRODUCT CATEGORIES AND SUBCATEGORIES

	Category I Advisory FSP	Advice	Intermediary Services
1.1	Long-term Insurance: Subcategory A	☑	☑
1.2	Short-term Insurance: Personal Lines	☑	☑
1.3	Long-term Insurance: Subcategory B1	☑	☑
1.4	Long-term Insurance: Subcategory C	☑	☑
1.5	Retail Pension Benefits	☑	☑
1.6	Short-term Insurance: Commercial Lines	☑	☑
1.7	Pension Fund Benefits (excluding retail pension benefits)	☑	☑
1.8	Securities and Instruments: Shares	☑	☑
1.9	Securities and Instruments: Money Market Instruments	☑	☑
1.10	Securities and Instruments: Debentures and Securitised Debt	☑	☑
1.11	Securities and Instruments: Warrants, certificates and other instruments acknowledging debt	☑	☑
1.12	Securities and Instruments: Bonds	☑	☑
1.13	Securities and Instruments: Derivative instruments excluding Warrants	☑	☑
1.14	Participatory Interests in one or more Collective Investment Schemes	☑	☑
1.16	Health Service Benefits	☑	☑
1.19	Friendly Society Benefits	☑	☑
1.20	Long-term Insurance: Subcategory B2	☑	☑
1.21	Long-term Insurance: Subcategory B2-A	☑	☑
1.22	Long-term Insurance: Subcategory B1-A	☑	☑
1.23	Short-term Insurance: Personal Lines A1	☑	☑

	Category II Discretionary FSP	Discretionary Services
2.1	Long-term Insurance: Subcategory B1	☑
2.2	Long-term Insurance: Subcategory C	☑
2.3	Retail Pension Benefits	☑
2.4	Pension Fund Benefits (excluding retail pension benefits)	☑
2.5	Securities and Instruments: Shares	☑
2.6	Securities and Instruments: Money Market Instruments	☑
2.7	Securities and Instruments: Debentures and Securitised Debt	☑
2.8	Securities and Instruments: Warrants, certificates and other instruments acknowledging debt	☑
2.9	Securities and Instruments: Bonds	☑
2.10	Securities and Instruments: Derivative instruments excluding Warrants	☑
2.11	Participatory Interests in one or more Collective Investment Schemes	☑
2.15	Long-term Insurance: Subcategory B2	☑
2.16	Long-term Insurance: Subcategory B2-A	☑
2.17	Long-term Insurance: Subcategory B1-A	☑

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10 ANNEXURE B: MANAGEMENT INFORMATION

The data sets listed below are examples of Management Information (MI) that could be used to measure and improve TCF performance. All six outcomes are relevant across all areas of business activity.

Delete data sets that are not applicable. For the remaining sets of data, targets will need to be set that will alert the TCF Champion of the organisation's failure to achieve the outcomes of TCF.

Where the organisation fails to meet the TCF outcomes, the TCF Champion will be required to evidence the actions that were taken in order to investigate and rectify the failure.

(*delete whichever is not applicable)

DATA SET: **SALES**	(Outcomes 2, 3, 4 & 5)
Data Measured	**Possible TCF Implications**
Sales volume by product type	Product suitability – excessive sales of one product may indicate mis-selling or unsuitable sales including inadequate suitability analysis
Sales volume by commission rate / type	Commission rate payable on a particular product may result in product bias, leading to mis-selling or unsuitable sales. As above, this may mean suitability was not properly assessed
Sales volume against expectations	Poor sales may indicate incorrect targeting or that the product is too complex; excess sales may indicate mis-selling and/or unsuitable sales, including affordability concerns
Cancellation within cooling off period	High cancellation rates may indicate unsuitable advice and/or a misunderstanding of the product on the part of the client
Early cancellation rates	Excessive early cancellations may indicate a lack of suitability of advice as the client believes the product is unsuitable or is unable to afford premiums and terminates early
Percentage of file check fails – total and by representative (based on a sample of files)	By FSP / Representative - evidence of systemic weaknesses and/or breaches of the General Code of Conduct (particularly disclosure) which may result in misleading or insufficient information being given and/or mis-selling. By representative – may indicate training needs
Number of new products introduced during a given period	Review in conjunction with product training statistics
Percentage of representatives completing new product training within a given period	Training and competency of representatives is a key component in ensuring that clients are treated fairly. Poor product knowledge may lead to inappropriate recommendations

(*delete whichever is not applicable)

DATA SET: **COMPLAINTS**	(Outcomes 1, 2, 3, 4, 5 & 6)
Data Measured	**Possible TCF Implications**
Volume of complaints	May indicate mis-selling or other failings affecting the fair treatment of clients
Complaints against any particular representative	As above, may reveal a training need
Complaints against a particular product	May indicate product and/or provider's marketing material is unclear or misleading or unsuitable for the target market. This could lead to mis-selling or other unfair treatment of clients

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Complaints relating to information supplied by representatives	Could indicate either a lack of clarity and completeness of essential features and other information that was supplied by the representative, (or in the actual financial services that were rendered) and/or deficiencies in the product information provided by the product provider to the representative
Complaints upheld internally – analysed by reference to whether there was negligence, failure to comply with statutory requirements of unfair treatment	May reveal trends depending on the underlying reasons and the need for improvements in the relevant areas. May be a measure of the fairness of the complaints handling procedures
Volume and percentage of complaints referred to FAIS Ombud	May identify possible areas of misunderstanding by clients as to what constitutes a complaint (assess possible action to reduce this). May indicate unfairness in the complaints handling process
Percentage of complaints to FAIS Ombud upheld	External measure of complaints handling process
Percentage of complaints to FAIS Ombud not upheld	May be indicative that the FSP's complaints handling process is fair and resulting in the right outcomes
Percentage of complaints acknowledged within the time frame stipulated in the official Complaints Policy of the FSP	Performance measurement of timeliness of complaints handling process
Percentage of complaints resolved within the time frame stipulated in the official Complaints Policy of the FSP	Performance measurement of complaints being handled in a fair and timely manner
Number of recommendations following complaint raised	Action being taken to improve standards. Could be evidence of a TCF culture and embedding
Number of recommendations following complaint that resulted in a change to procedure or policy	Action taken to improve standards/reduce complaints. Could be evidence of a TCF culture and embedding

(*delete whichever is not applicable)

DATA SET : **POINT OF SALE**	(Outcomes 2, 3 & 4)
Data Measured	**Possible TCF Implications**
Score rating of quality of financial services rendered and/or information provided following mystery shopping, telephone or other monitoring	Measure of the quality of financial services rendered and/or information provided by representative. Shortcomings may result in unsuitable sales or other unfair outcomes

(*delete whichever is not applicable)

DATA SET: **AFTERS SALES SERVICE**	(Outcomes 1, 2, 3, 4 & 6)
Data Measured	**Possible TCF Implications**
Percentage of clients contacted within 12 months of completion and reason for contact	May be a measure of the standard of client care, depending on the reason for the contact
Clients contacted to notify unsuitability of product following TCF review	Indicative of the existence of serious compliance breaches at the point of sale and possibly in other areas resulting, in mis-selling. May be indicative of wider systemic shortcomings
Percentage of clients contacted following completion of satisfaction survey	Fairness related questions (e.g. 'what does this product do'?/ 'why did you buy it'?) and questions relating to whether the client understood what type of service they received may indicate whether the client has been treated fairly
Overall service satisfaction score for this period out of 10	May indicate whether clients are being fairly treated, depending on the questions asked

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(*delete whichever is not applicable)

DATA SET: **CULTURE AND VALUES**	(Outcomes 1)
Data Measured	**Possible TCF Implications**
Percentage of staff who have completed general TCF training – sales and non-sales	May be indicative of TCF awareness and a TCF culture and communication strategy
Percentage of staff who have completed additional TCF training specific to their area	As above – likely to further enhance TCF awareness and the development of an embedded TCF culture
Number of representatives who received retraining following high volumes of complaints/file fail checks	May be indicative of TCF awareness and a TCF culture – firm is routinely identifying and acting on TCF issues
Number of TCF goals in place by business area (financial services, complaints, advertising, after-sales service)	May be indicative of TCF awareness and an embedded TCF culture
Percentage of TCF goals achieved by business area for this period	May be indicative of TCF awareness and an embedded TCF culture
Number of sales/non-sales staff rewarded for meeting TCF targets	May be indicative of TCF awareness and an embedded TCF culture
Number of staff rewarded for suggestions to improve service (whether following complaints or otherwise) – all and/or by business area	May be indicative of TCF awareness and an embedded TCF culture
Documented TCF Policy and strategy	Senior management/business owner commitment and strategy
TCF MI reports, regular minutes of meeting, reporting structures and review processes.	Embedding of TCF culture and use of TCF MI is being identified, reviewed and acted on
Minutes evidencing monthly review of TCF MI by senior management or business owner and/or TCF Committee or Champion and actions taken in response	Embedding of TCF culture and use of TCF MI is being identified, reviewed and acted on
Staff surveys/opinions on how TCF is working and on how it could be improved	Captures staff perception of how fairly a firm treats its clients. Further evidence of embedding of TCF culture

(*delete whichever is not applicable)

DATA SET: **ADVERTISING AND PRODUCT PROMOTION**	(Outcomes 2, 3 & 5)
Data Measured	**Possible TCF Implications**
Volume of complaints by promotion type (advertisement, Direct Marketing)	Could indicate that promotion is unclear or inaccurate, depending on the nature of the complaint The nature of the complaint, root cause, and decision taken can indicate whether a client has been treated fairly.
Number of compliance breaches picked up by the in-house monitoring process	May indicate that monitoring processes are operating satisfactorily, a poor technical understanding in the marketing areas, a poor understanding of what constitutes using clear, fair and not misleading information – may identify training needs
Number of compliance breaches picked up by the Regulator	Inadequate financial services being rendered to clients. May indicate problems with a poor technical understanding of the product or lack of familiarity with General Code of Conduct requirements

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(*delete whichever is not applicable)

DATA SET: **FEEDBACK TO PRODUCT SUPPLIERS**	(Outcomes 1 & 5)
Data Measured	**Possible TCF Implications**
Number of cases of product feedback / suggestions to providers to assist TCF	Feedback on the quality / suitability of a product and/or clarity of product information may improve consumer outcomes

(*delete whichever is not applicable)

DATA SET: **STRATEGY**	(Outcomes 1)
Data Measured	**Possible TCF Implications**
The FSP has a strategic commitment (documented) to avert major TCF risks / failings through ongoing scrutiny of sales targeting of products	FSP's commitment to prevent major TCF failings – such as endowment mis-selling.

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11 ANNEXURE C: TCF CHAMPION APPOINTMENT

The FSP has appointed a TCF Champion as part of its commitment to treat its clients fairly.

The general duties of the TCF Champion include:

- To be actively involved with embedding the TCF principles into the organisation.
- To help instilling a culture where the fair treatment of clients is embraced and adopted.
- To assist the governing body of the organisation to implement and adopt business processes aimed at ensuring that the organisation is at all times achieving the outcomes of TCF as set out in this document.

The TCF Champion has the authority to approach and speak to staff members at all levels about the delivery and achievement of TCF outcomes.

The TCF Champion need not have any specific qualifications but must have a thorough knowledge of the organisation's functional departments, business processes and the principles associated with treating clients fairly.

*(*List specific duties, where so required)*

As Key Individual of the FSP, I Francis Vernon Thomas Cloete hereby appoint Francis Vernon Thomas Cloete & Lesa-Jo Blonski

as the FSP's Treating Clients Fairly Champion.

F.V.T CLOETE

_____ 1 November 2021

Key Individual Signature **Date**

F.V.T CLOETE L Blonski

_____ 1 November 2021

_____

TCF Champion Signature **Date**

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