

RECM* TREATING CUSTOMERS FAIRLY (TCF) POLICY STATEMENT

* includes RECM Collective Investments (Pty) Ltd and Regarding Capital Management (Pty) Ltd

Introduction

RECM was founded with the primary aim of putting clients' interests first. RECM is committed to being long-term stewards of our clients' assets, remaining true to our investment philosophy and process and retaining close relationships with our clients. Our vision is to be recognized as one of the best global asset managers and our Treating Customers Fairly Policy is an integral part of that objective.

Responsibility is placed on the Board of Directors and senior management to deliver fair outcomes for customers. We require all of our staff to apply the principles of TCF in their work irrespective of their role.

The Desired Outcomes for Customers

In terms of TCF, RECM is focused on delivering 6 outcomes for customers:

1. Customers are confident that they are dealing with a firm where the fair treatment of customers is central to the firm culture.
2. Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.
3. Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
4. Where customers receive advice, the advice is suitable and takes account of their circumstances.
5. Customers are provided with products that perform as they have been led by RECM to expect and the associated service is both of an acceptable standard and what they have been led to expect.
6. Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

How will RECM achieve these outcomes?

At RECM, we have considered how we can provide improved outcomes for our customers as a fundamental part of our business. We demonstrate our commitment to our customers in the following ways:

- we design and market our products to meet the needs of identified groups of customers;

- we provide customers with clear information and keep them appropriately informed before, during and after the point of sale;
- we are able to refer customers who require financial advice to suitable independent financial advisers to address the customer's needs;
- we provide customers with products that perform as we have led them to expect and any associated services to an acceptable standard;
- we do not use incentives for salespeople that reward behaviour which is inconsistent with the desired outcomes;
- we do not create unreasonable post-sale barriers for customers to change product, switch provider, submit a claim or make a complaint;
- we deal with complaints in accordance with regulatory rules and guidelines; and
- we maintain internal controls to assure the achievement of these outcomes;

In order to fulfil our commitment to treating our customers fairly we focus on the following areas

Product Design

We identify what customers want and need and provide products and distribution strategies to meet the requirements of the specific target markets.

Products are not structured in a way that is liable to give rise to unfairness to customers through, for example: unreasonably high up-front charges, unreasonably high ongoing fees, hidden penalties, or unexpected risks to their capital.

Products are structured in a way that the fees, charges and penalties payable by customers are considered fair and reasonable. We always design our products so that the risks are capable of being understood by our customers.

Promotion and Marketing

Our messages are clear and the content fair. Small print is kept to a minimum and avoided wherever possible.

The quality and clarity of promotions are scrutinized by senior management within RECM prior to publication.

The risks and rewards associated with our products are presented in a balanced manner to enable customers to understand the key features of our products and make an informed decision.

Promotions will provide the information that customers need to be able to work out what the product is about and what they will receive so that they are less likely to be surprised or to feel let down by what they actually get from the product.

Advice

We do not provide financial advice to customers. Where customers require financial advice, we are able refer them to suitable independent financial advisers to address the customer's needs. Where we have referred customers for advice, we will follow up with them to verify that they have been assisted.

Point of Sale

We provide clear plain English explanations of products and the use of jargon is avoided wherever possible. Where jargon cannot be avoided, a suitably clear explanation is given.

We will identify the needs of customer groups and sell products which are designed to meet their needs and we do not make opportunistic sales to them of 'the flavour of the month' product.

Ongoing Service Standards

We provide appropriate after sales information and acceptable levels of service for post-sale transactions or enquires.

We monitor the continuing performance of products that we have sold to customers for continued suitability.

Complaints Handling

We handle complaints fairly and record, monitor and report them sensibly.

In dealing with complaints we treat like situations alike and we undertake to identify common underlying causes of complaints and take action to eliminate the root cause. We give careful consideration to whether an error might have affected a wider class of customers and what should be done to remedy this.

Senior management pays attention to the outcomes of complaints, which can serve as an important source of intelligence about the health of our business and systems. Where appropriate we may obtain feedback from customers who have experienced our complaints process in order to improve the level of service that we provide.

We measure the length of time taken to deal with a complaint, the outcome, and the way in which the outcome is communicated to the customer in order to ensure that we are treating our customers fairly.

Treating Customers Fairly in our business

TCF is and must remain actively embedded at all levels of our business. Examples of this are as follows:

- We encourage and welcome feedback from staff and customers on our products and procedures.
- Staff objectives include TCF as an explicit and measurable objective and performance against this objective forms part of staff competency ratings.
- Bonus and incentive schemes reflect the fair treatment of customers.
- The training provided to staff includes TCF as core knowledge for all staff engaged in activity with a potential customer impact.
- TCF forms an integral part of induction training and refresher training. All business areas include TCF as an explicit risk item and by using the relevant controls and management information they ensure that they drive improvements in outcomes for our customers.
- New TCF issues are captured on a register together with the actions agreed to resolve the issue. Senior management review and discuss the register as required. The current status of the actions is monitored. All staff are easily able to raise a TCF issue and receive feedback on the outcome.
- Monthly management information is in place to measure customer outcomes and give visibility to senior management, including the Board of Directors, to allow appropriate action to be taken where TCF issues arise.
- Before we engage with a third party we will satisfy ourselves of their commitment to treating our customers fairly. In particular, we will consider their TCF policy and the range of management information that they can provide to demonstrate the fair treatment of our customers.
- Our complaints process is clear and easy to understand.