



Treating Customers Fairly Policy

Treating Customers Fairly

RealFin Capital Partners Proprietary Limited ("RealCap") is committed to ensuring that the Financial Services Board's ("FSBs") initiative of "Treating Customers Fairly" ("TCF") is embedded in all areas of our business. As part of our overall approach, we are fully committed to treating our customers fairly and as such and due to our obsession with perfection, we endeavour to meet their expectations of high quality service.

Our clients are our most valuable asset and our aim is to;

- protect the interests of our clients at each stage of the investment process;
- endeavour to meet our clients' expectations of high quality service.

Our TCF policy is centred around the guidance provided by the FSB to ensure we consistently deliver fair outcomes to our clients and take responsibility for the company and staff (at all levels) providing an enhanced service quality to clients, based on a culture of "living compliance" as well as a culture of openness and transparency.

FSB Guidelines – Six Outcomes

Our TCF Policy is centred on the FSBs guidelines and the six outcomes produced:

Outcome 1

Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.

Outcome 2

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

Outcome 3

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

Outcome 4

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

Outcome 5

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

Outcome 6

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

Our Commitment

- RealCap discloses the fact that it does not perform a Financial Needs Analysis upfront as it does not render advice and if clients have any uncertainties, they ought to seek the advice of their independent financial advisers;
- We will disclose all costs with regards to our product offering;
- We will make sure that the client understands the product and any risks associated with it;
- We will ensure that all conflicts of interest are clearly disclosed to enable the client to make an informed decision;
- We will ensure that all client communications are clear, concise, unambiguous and not misleading;
- We will ensure that all Investment Consultants have received training on the products being marketed and are able to ascertain the level of knowledge and understanding of clients;
- We will continuously ensure that all staff members fully understand the Six Outcomes detailed above;
- We will listen to client feedback and will deal with any complaints timeously;
- We will ensure that a mandate is signed between ourselves and the client detailing the extent of our discretionary services;
- We will send a quarterly report to all discretionary clients detailing progress made during the quarter on investments;
- Where a breach of mandate has taken place we will rectify the situation so that the client is not prejudiced;
- We will ensure that authority is obtained for Personal Account Trading and that no such trading takes place until authority has been obtained;
- We will ensure that no Insider Trading takes place;
- We will ensure that detailed fund fact sheets are produced quarterly for funds being managed clearly detailing composition, costs and performance.

Complaints policy

We respond in a timely manner to our clients and prospective clients' questions and queries, and address any issues or concerns promptly.

RealCap have systems in place to deal with client complaints which will be escalated as appropriate and as required by us in terms of the Financial Advisory and Intermediary Services Act 2002 in order to meet our obligations to our clients and our regulator, the FSB.

Our full Complaints Policy is available on request.

Staff

We recognise that our employees are critical to delivering a positive client experience and ensuring our clients are treated fairly. Our culture and values encourage and support our employees to deliver this. As such, all of our employees are fully trained in dealing with our clients, and in treating them fairly and in particular, we will continuously ensure that all staff members fully understand the Six Outcomes detailed above.

We remunerate and incentivise our employees to encourage them to deal with all clients fairly, and continually to find ways to improve. RealCap caters for all staff to be eligible for equity participation in the company; staff currently hold 10% of shares via the RealFin Capital Partners Employees Trust. Furthermore, bonuses are paid annually and are determined by the profitability of the company and the qualitative and quantitative performance of staff members.

Client Feedback

We welcome client feedback on our products/services provided and whether it is in line with their legitimate expectations.

<http://www.realcap.co.za/feedback/>

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