



TREATING CUSTOMERS FAIRLY POLICY

1. Introduction

The overriding principle central to the Raddix culture and ethos is that clients come first. Raddix is committed to the fair treatment of all clients, irrespective of size or vehicle through which they access our products and services. Raddix recognises that client satisfaction is the foundation on which to build a financial services business which is sustainable over the long term. Delivering optimal customer outcomes is an enterprise-wide responsibility and requires participation from all parts of the business. Apart from any legislative or regulatory obligations, treating customers fairly is a business imperative. Without clients, we have no business.

2. Ethos and Values

The Raddix Ethos is summarized in our company motto:

“We are effective and efficient, first time, in time, every time. We can be trusted to truly care for the wellbeing of our clients and the future of our Group”.

Our values are:

- Act with integrity to put the interests of clients first. The definition of integrity in Raddix is to authentically do the right things for the right reasons;
- To adhere to the value of professionalism we shall act with attention to detail in the interest of our clients;

- We act with respect where we consider others and act with discipline in our contact on all levels;
- We are loyal to our clients whose interests and wellbeing are the core focus of Raddix;
- We focus on contribution and not title;

3. Treating Customers Fairly – The Financial Services Board

The Financial Services Board (“FSB”) published its “Treating Customers Fairly (“TCF”) Roadmap” in March 2011 as a first step towards achieving TCF fairness outcomes and culture framework requirements. The FSB requires firms to measure their activities against six TCF fairness outcomes (the “Outcomes”) and to also embed the TCF outcomes into the Raddix reward structures that aim to reduce market conduct risks and protect consumers of financial products:

Outcome 1 (“Culture”): customers are confident that they are dealing with a financial services provider where the fair treatment of customers is central to its culture;

Outcome 2 (“Products and Services”): products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly;

Outcome 3 (“Clear and Appropriate Information”): customers are given clear information and are kept appropriately informed before, during and after the time of contracting;

Outcome 4 (“Customer Advice”): where customers receive advice, the advice is suitable and takes account of their circumstances;

Outcome 5 (“Product Performance Expectations”): customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect;

Outcome 6 (“Post Sale Barriers”): customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

Raddix fully supports the FSB's TCF Outcomes, to the extent relevant to our business and our role as financial services provider in the market.

We have a process in place whereby we periodically evaluate ourselves against the Outcomes and we always strive to improve the way we live and/or evidence our adherence to the TCF principles. The TCF principles are a business imperative, embedded in our strategy, governance and daily processes, as more fully described below:

4. Achieving Outcomes

Raddix will demonstrate through our values, business practices and complaints procedures that we are treating customers fairly throughout the stages of the product life cycle to which we are able to contribute. These include:

4.1 Product and Service Design:

Products and services are designed to meet customers' needs with a focus on specific target markets and their unique requirements.

4.2 Promotion and Marketing:

Appropriate products are marketed to specific target markets, through clear and fair communications that are not misleading.

4.3 Advice:

Our advisors are adequately trained to enable them to provide advice that is suitable to the needs of the customer concerned. They act in line with the objectives of TCF and avoid conflicts of interest. The TCF outcomes applicable on advisors are embedded in our remuneration structure.

4.4 Point-of-sale:

We provide clear and fair information to enable customers to make informed decisions with regards to our products and services. Risks, commitments, limitations and charges are disclosed at the outset.

4.5 Information after point-of-sale:

We provide information on an on-going basis to enable both our advisors and customers to monitor whether their needs are being met by the product or service selected.

4.6 Complaints and claims handling:

We honour representations, assurances and promises that lead to legitimate customer expectations. Legitimate expectations must not be frustrated by unreasonable post-sale barriers. Claims and complaints are handled timeously, fairly and consistently.

To fulfil our commitment to TCF, we will adhere to the following standards:

- We will follow the requirements of the FAIS General Code of Conduct;
- We will put mechanisms in place to enable us to monitor and measure our performance in delivering the relevant fairness outcomes;
- We will ensure that our staff are adequately trained and maintain high standards of service;
- Our remuneration which includes incentives encourage dealing with customers in a manner that is fair and unbiased;
- We will tell customers what they can expect from their relationship with us;
- We will provide appropriate after sales information and service to customers;
- We will monitor the performance of products or funds that we have recommended and sold to customers to assess the on-going suitability of the product for the customer;

- We will ensure open communication lines with the product suppliers we deal with to ensure that we understand their products and services;
- We will review our TCF policy on an **ad hoc** basis but at least annually;
- We will encourage and welcome feedback from staff and customers on our services and procedures;
- We will train staff on our TCF policy on an **ad hoc** basis but at least annually;
- We will satisfy ourselves that those with whom we do business are committed to treating customers fairly. We will consider their TCF policy and the management information that they can provide to demonstrate the fair treatment of our customers;
- Our complaints procedure will be clear and easy to understand.
- We will handle complaints fairly, timeously and impartially;
- We will pay attention to the outcomes of complaints, which can serve as an important source of information about the performance of our business and systems. We will investigate the root causes of complaints in order that we improve the level of service that we provide;

4.7 Treating Customers Fairly:

- We encourage and welcome feedback from staff and customers on our services and procedures;
- Staff objectives include TCF as an explicit and measurable objective and performance against this objective will form part of staff competency and variable remuneration criteria.
- All staff will complete refresher training and testing on an *ad hoc* basis.
- Before we contract with a third party we will satisfy ourselves of their commitment to treating our customers fairly in terms of product design and the delivery of the other TCF outcomes
- Our complaints process is centralised to ensure that it is standardised, clear and easy to understand.

4.8 Developments:

The TCF framework designed by the FSB is a set of principles/norms that will find their way into law via existing legislation, regulation and guidelines. There are many examples of the TCF Outcomes already incorporated into the existing regulatory framework, however the FSB is considering a "Conduct of Business Act" with specific "Codes of Conduct" to give further legislative effect to their stated goals.

On the basis that regulation around TCF is yet to be fully defined, this Policy will be subject to routine review as the regulatory environment becomes clearer.

For any enquiries or feedback in relation to Treating Customers Fairly in Raddix, you are welcome to contact us at the following contact detail:

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