



EXCELSIA CAPITAL (PTY) LTD

(FSP No. 46756)

TREATING CUSTOMERS FAIRLY POLICY

1. INTRODUCTION

The Treating Customers Fairly (TCF) initiative is a key component of the Financial Services Board's broader consumer protection and market conduct mandate. TCF is an outcomes-based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms.

Excelsia Capital incorporates TCF into the way that we conduct business every day and in the way that we deal with our clients. We may not outsource this responsibility to another party, although our compliance officer may provide guidance and assistance with regards to incorporating TCF into our business.

2. THE SIX TCF FAIRNESS OUTCOMES

We have incorporated the following six TCF outcomes into our business operations, where applicable:

Outcome 1: Customers are confident that they are dealing with a firm where the fair treatment of customers is central to the firm culture.

Outcome 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.

Outcome 3: Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.

Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

Outcome 5: 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: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

Our approach to TCF is reflected into the following organisational structures and processes:

- **Leadership:** The Board and management (both Key Individuals) provide direction and monitor the delivery of TCF behaviours and outcomes.
- **Strategy:** The TCF aims are not merely stated vision and values, but built into our strategic and business plans.
- **Decision-making:** Decisions that impact on customers are subject to the challenge implicit in our TCF strategy.
- **Governance and controls:** Our governance structures and control mechanisms are designed to cater for TCF considerations and include TCF measurement systems and identification of TCF risks. Excelsia is still very small and does not require formalised governance structures at this stage, but the intention, as it grows, is to ensure these are appropriately developed to meet our TCF objectives.
- **Performance management:** Our staff and representatives are trained to deliver appropriate TCF outcomes.
- **Reward:** Excelsia's bonus pool is designed to reward staff for contributing towards the success of the company in terms of value added to the business and to our clients.

3. TCF RESPONSIBILITY

Incorporating TCF in the business is the responsibility of the Key Individuals who shall be proactive in driving the process.

The Compliance Officer will independently monitor TCF compliance from time to time and report on non-compliance items detected.

4. RISK MANAGEMENT AND POLICIES

The following Excelsia policies and documents will be aligned to the TCF outcomes:

- Code of Conduct and Ethics Policy;
- Conflict of Interest Management Policy;
- Risk Management Plan;
- Order Execution Policy;
- FAIS Compliance Manual;
- Portfolio Management Agreement and Investment Mandate;
- Outside Interests and Personal Account Investing Policy;
- Complaints Resolution Procedure, and
- Marketing and advertising material.

5. TRANSPARENCY AND DISCLOSURE

Excelsia will ensure that all client communication is clear, correct and relevant and that clients are kept appropriately informed before, during and after transacting.

Excelsia is committed to dealing with current and potential clients in a transparent manner, and is willing to accommodate detailed information requests from its clients, provided this does not cause harm to any of its other clients, or breach any confidentiality undertakings.

6. TRAINING AND AWARENESS

All staff will undergo training on the TCF outcomes and the requirement for adherence to Excelsia's policies and procedures (incorporating the principles of the TCF outcomes) is included in the letters of employment for all staff.

7. CONFIDENTIALITY

Excelsia is committed to the protection of clients' personal and other information, and has incorporated the necessary procedures and controls for the safeguarding of such information.

A policy in terms of the Protection of Personal Information Act, 2003 ("POPI") will be formally documented setting out:

- What personal information is collected;
- How it is used and safeguarded;
- Under what conditions it may be responsibly disclosed, and
- The rights of the client to request access to such information, and update, correct or delete as required.

8. COMPLAINTS RESOLUTION

Excelsia has a documented Complaints Resolution Procedure and will ensure that:

- The complaint is properly reviewed and that value is derived from such review;
- The information is used to prevent similar complaints and to identify how clients in a similar position may be affected, and
- the complaint is properly dealt with and any information gathered is not ignored.

9. SERVICE PROVIDERS

In selecting its outsourced service providers (fund administration, compliance and IT), Excelsia will take into account whether these providers are ideally suited to allow Excelsia to best meet its commitment to its clients in terms of this TCF policy.

10. ADVICE

Excelsia is not authorised in terms of its FSB licence to provide advice. Accordingly, in order to avoid any misunderstandings, it should be ensured, in all interactions with clients or potential clients, that advice is not given and reference to this limitation is included in any documentation or marketing information provided.

11. REVIEW

This policy shall be reviewed on an annual basis, or when deemed necessary, and shall be Board approved.