

Investa Financial Services(Pty) Ltd (Investa) - FSP 24958 Policy document - Treat Customers Fairly

The processes contained herein forms part of Investa's internal control structures and procedures.

Contents

1. Definitions.....	2
2. Introduction.....	3
3. The six fairness outcomes.....	3
4. Achieving the outcomes.....	4
4.1. Culture and governance.....	4
4.2. Service design.....	4
4.3. Promotion and marketing.....	4
4.4. Advice.....	5
4.5. Service provision.....	5
4.6. Post sales barriers.....	6
5. Focus area.....	6
6. Complaints handling.....	7
7. Treating customer fairly in our business.....	7
8. Queries relating to the policy.....	7
INVESTA CONTACT INFORMATION.....	7

1. Definitions

“Client”:

A specific person or group of persons, excluding the general public, who is or may become subject to a financial service rendered intentionally by the FSP's.

“Conflict of interest”:

Means any situation in which a provider or a representative has an actual or potential interest that may, in rendering a financial service to a client –

- a) Influence the objective performance of his/ her or its obligations to that client; or
- b) Prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interests of the client, including but not limited to:
 - i) A financial interest,
 - ii) An ownership interest,
 - iii) Any relationship with a third party

“FSCA”

Financial Sector Conduct Authority, is the market conduct regulator of financial institutions that provide financial products and financial services, financial institutions that are licensed in terms of a financial sector law, including banks, insurers, retirement funds and administrators, and market infrastructures.

“FSP”

Financial Services Provider authorised in terms of the Financial Advisory and Intermediary Services Act, 37 of 2002.

“TCF”

Treating Customers Fairly (TCF) is an outcome based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms.

“The company”

Investa Financial Services (Pty) Ltd also referred to as Investa

2. Introduction

The Directors and Management of Investa are committed to ensuring that all principles of Treating Customers Fairly (TCF) are applied in all areas of our day to day business activities. Our corporate philosophy is imbedded with customer centricity. In adopting these principles, the company recognise that fair treatment of our customers is about adding value to the service we offer by aiming to:

- Protect the interests of our customers at each stage of the product life cycle, from product creation, promotion, right through to after sales service which in our business is claims handling.
- Meet as best we can the unique needs of each customer by offering a transparent, efficient and professional service, and constantly reviewing our service to identify areas for improvement.
- Drive a client centric and service-oriented culture geared towards customer satisfaction.
- Ensuring that any partner actively involved in servicing their clients with our collection and recruitment services will be fully introduced to our TCF standards and will be required to adhere to our TCF Policy fully if they do not have their own TCF policy that meets our monitoring standard.

3. The six fairness outcomes

Six TCF principles have been adopted within the company across all business practices, governance frameworks and day-to-day processes.

- Outcome 1:
Customers can be confident that they are dealing with an entity where the fair treatment of customers is central to the entity's culture.
- Outcome 2:
Products are designed to meet the needs of identified types, kinds or categories of customers and are targeted accordingly.
- Outcome 3:
Customers are given clear information and are kept appropriately informed before, during and after the time of entering into a service contract.
- Outcome 4:
Where customers receive advice, the advice is suitable and takes account of their circumstances.
- Outcome 5:
Customers are provided with services that perform as the service provider or their representatives have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect; and

- Outcome 6:
Customers do not have to face unreasonable post-sale barriers to change or replace a product, submit a claim and/or or lodge a complaint.

4. Achieving the outcomes

The company will aim to demonstrate through its behaviour and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle. These may include:

4.1. Culture and governance

To ensure that the company applies business practices fully governed by a culture of TCF, the directors and management will adopt the TCF framework and are specifically responsible to ensure that it is embedded throughout the organisation.

The responsibility of the end-to-end implementation of the TCF Framework has been delegated to the compliance function as the custodian of the internal / external rollout across the group as a whole.

Measurement standards will be implemented and monitored regularly.

4.2. Service design

Products and services and their distribution strategies are designed to meet the needs of identified groups and clients and are marketed accordingly.

Extensive due diligence has been conducted over the years by the directors and management team to ensure that the selected target market is touched through clients and through entities that receive and on-sell our services to their clients.

4.3. Promotion and marketing

The company markets their products on social media and websites, but the bulk of the marketing to clients is through sales consultants. Procedures are in place to ensure that customers are not provided with misleading information or misrepresented facts,

Guidance documents are developed which governs the activities defined as advertising or marketing in terms of statutory requirements

These guidance documents govern the way of work within the business and set out the processes, regulatory requirements and minimum standards which need to be complied with by all stakeholders.

A firm sign off processes has also been put in place to ensure that disclosures and product related marketing material is reviewed objectively by compliance

department within the company to ensure that the material is appropriate and not misleading.

4.4. Advice

Where the company provides advice in their own capacity and where sales consultants engage with services providers and clients in this regard and they ensure that the information and advice provided is suitable and takes all circumstances of advice into account.

The company is also committed to ensuring that any representative appointed under their license, will meet the requirements set out in section 7(1)(b) of the FAIS Act as well as any fit and proper requirements prescribed under the FAIS Act, including but not limited to the FAIS product knowledge and competency requirements.

The company also has due diligence processes in place before contracting with a new intermediary or financial service provider to ensure that they are licensed as financial services providers and authorised to render financial services in respect of the services that will be offered.

The company will also ensure that the mandates they obtain from clients are compliant in accordance with section 8 of the FAIS Act to be satisfied that the independent intermediary and, where applicable, any persons rendering services as intermediary on the independent intermediary's behalf meet the FAIS product knowledge competency requirements and have the operational and technological infrastructure to support the advice process.

4.5. Service provision

The company ensures that clients are given clear information and are kept appropriately informed before, during and after the time of entering into a contract and through the due diligence process.

The company will comply with all statutory disclosure requirements and we have documented procedures and minimum requirements to ensure all stakeholders align.

In addition, FAIS and the general codes of conduct associated with various categories of services also governs the engagement with our customers and service providers.

4.6. Post sales barriers

The company ensures that our clients do not face unreasonable post-sale barriers to query a collection or mandate or make a complaint.

We believe that the full customer journey must be of a high quality and must at no time prejudice the customer in any way whatsoever.

Dedicated complaints personnel have strong governance and review processes to ensure that customers are not treated unfairly when dealing with us.

Furthermore, the company is fully transparent with its customers and will ensure that we provide suitable channels for customers to contact us if they have complaints or queries. In addition, we monitor complaint data to ensure that agreed turnaround times and minimum service standards are adhered to.

The company is committed to ensuring that we continuously monitor management information relative to complaints, claims and switching processes to identify trends of poor customer treatment and to implement corrective measures to ensure that clients do not face any post sales barriers.

5. Focus area

The company will:

- follow the requirements of the Financial Advisory and Intermediary Services Act, 37 of 2002, including all sub-ordinate legislation.
- regularly monitor and report on all of the above TCF outcomes as part of the company's monthly statistics, in order to assess TCF performance across the business and recommend changes where appropriate.
- ensure that all our sales staff are thoroughly trained to deal with our clients and are committed to maintaining high standards of service.
- ensure that all our staff are not remunerated or incentivised in ways which encourage them to deal with our clients in an unfair or biased manner.
- always tell customers what they can expect from our relationship.
- provide appropriate after sales information and service to customers.
- ensure open communication lines with all our clients and ensure that we understand their products and services.
- review our TCF policy on an ad hoc basis but at least annually.

6. Complaints handling

In dealing with complaints the company will “treat like situations alike” and consider whether an error might have affected a wider class of customers; and what should be done to remedy this.

The company will:

- handle complaints fairly, promptly, and impartially.
- pay attention to the outcomes of complaints, which can serve as an important source of intelligence about the health of our business and systems. We will investigate the root causes of complaints and obtain feedback from customers who have experienced our complaints process in order to improve the level of service that we provide.
- 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.

7. Treating customer fairly in our business

The company:

- encourages its staff to recommend improvements to service and to monitor the outcome of changes in order to exceed customer expectations.
- continually strives to encourage non-sales staff to implement TCF in their day to day business activities.
- encourages after sales interaction with clients where appropriate to correct or improve on the service already offered .
- will ensure that staff are kept up to date with relevant training in relation to competence, data protection and other matters directly affecting the quality of service offered to customers.
- will ensure that TCF outcomes, which are set and communicated by management, are supported by all staff, and understood in the same way.

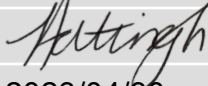
8. Queries relating to the policy

For any queries or feedback relating to this policy, please contact us through any of the communication channels provided below:

INVESTA CONTACT INFORMATION

- Telephone number: (012) 004 1445
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POLICY APPROVAL

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