

TREATING CUSTOMERS FAIRLY POLICY

TABLE OF CONTENTS

1.	POLICY CONTEXT	3
2.	THE SIX FAIRNESS OUTCOMES	3
3.	ACHIEVING THE OUTCOMES	4
4.	FULFILLING OUR COMMITMENT TCF	5
5.	COMPLAINTS HANDLING	6
6.	TREATING CUSTOMERS FAIRLY IN OUR BUSINESS	6

1. POLICY CONTEXT

Gradidge-Mahura Investments Proprietary Limited (“**we/our/us**”) prides itself in providing trusted, independent and objective services which are delivered by focusing on our clients and providing personalised service to meet individual needs. This is achieved by means of an integrated comprehensive personalised framework incorporating investment, taxation and risk advice. Our clients are one of our most valuable assets and our aim is to:

- Protect the interests of our clients at each stage of the advise process, from the very first meeting through to their review.
- Endeavour to meet our clients expectations of the best professional service.

Our policy of treating customers fairly (“**TCF**”) is structured according to the regulatory guidance provided by the Financial Sector Conduct Authority (FSCA). Our clients obtain exceptional service and we strive for good corporate governance and transparency.

2. THE SIX FAIRNESS OUTCOMES

We will strive to comply with and contribute to the TCF fairness outcomes, viewed from the perspective of the customer:

- 2.1 **Outcome 1:** Customers are confident that they are dealing with providers where the fair treatment of customers is central to the provider’s culture.
- 2.2 **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.
- 2.3 **Outcome 3:** Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
- 2.4 **Outcome 4:** Where customers receive advice, the advice is suitable and takes account of their circumstances.

2.5 **Outcome 5:** Customers are provided with products that perform as providers have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.

2.6 **Outcome 6:** Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

3. ACHIEVING THE OUTCOMES

We will aim to demonstrate through our behaviours and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle to which we can contribute. These may include:

3.1 **Product and service offering:** Appropriate products and services are researched in order to ensure that each customer group receives sound and holistic financial services.

3.2 **Promotion and marketing:** Products are marketed to specific target groups, through clear and fair communications that are not misleading and are appropriate to the target group.

3.3 **Advice:** Where advice is provided, advisers are fully equipped to provide advice that is suitable to the needs of the customer concerned, following the objectives of TCF and avoiding conflicts of interest.

3.4 **Sale to clients:** To provide clear and fair information to enable customers to make informed decisions about transacting with us. All fees are transparent to clients and are sufficiently documented.

3.5 **After sale Service:** Provide continued excellent service to clients thus enabling them to monitor their financial needs and make informed decisions.

3.6 **Complaints Handling:** To honour representations, assurances and promises that lead to legitimate customer expectations. Legitimate expectations must not

be frustrated by unreasonable post-sale barriers. There is a requirement for fair and consistent handling of complaints and a mechanism to deal with complaints timeously and fairly.

4. FULFILLING OUR COMMITMENT TO TCF

In fulfilling our commitment to TCF, we will focus on the following aspects.

- 4.1 We will follow the requirements of the General Code of Conduct for FSPs in terms of the Financial Advisory and Intermediary Services Act (“**FAIS**”).
- 4.2 We will adhere to our Conflicts of Interest Management Policy in dealing with conflicts of interest involving customers.
- 4.3 We will put management information mechanisms in place that are designed to monitor and measure our performance in delivering the relevant fairness outcomes.
- 4.4 All our members of staff are trained to deal with our clients and are committed to maintaining high standards of service.
- 4.5 We will always tell customers what they can expect from our relationship.
- 4.6 We will provide appropriate after sales information and service to customers.
- 4.7 We will monitor the continuing performance of products or funds that we have recommended and sold to customers to assess the ongoing suitability of the product for the customer.
- 4.8 We will ensure open communication lines with product suppliers we deal with and ensure that we understand their products and services.
- 4.9 We will review our TCF policy on an *ad hoc* basis but at least annually.

5. COMPLAINTS HANDLING

- 5.1 We have a Client Complaints Policy in place as required by FAIS.
- 5.2 We will handle all complaints in compliance with our Client Complaints Policy.
- 5.3 Our Client Complaints Policy is clear and easy to understand.
- 5.4 In dealing with complaints we will 'treat like situations alike' and give careful consideration to whether an error might have affected a wider class of customers and what should be done.
- 5.5 We will pay attention to the outcomes of complaints, which can serve as an important source of intelligence about the health of our business and systems.
- 5.6 We will 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.

6. TREATING CUSTOMERS FAIRLY IN OUR BUSINESS

- 6.1 We encourage and welcome feedback from staff and customers on our services and procedures.
- 6.2 Staff objectives include TCF as an explicit and measurable objective and performance against this objective will form part of staff competency ratings.
- 6.3 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 particular, we will consider their TCF policy and the management information that they can provide to demonstrate the fair treatment of our customers.

For any queries or feedback in relation to TCF, you can contact:

Contact Person: Mr Kagisho Mahura
Position: Key Individual
Postal Address: PO Box 78219, Sandton, 2196
Physical Address: 28 Fricker Road, Illovo, 2146
Phone Number: 010 448 2200
Email Address: kagisho@gminvestments.co.za