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## INTRODUCTION

The Treating Customers Fairly (“TCF”) initiative is a key component of the Financial Sector Conduct Authority (“FSCA”) broader consumer protection and market conduct mandate. 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.

REGIVE Capital (Pty) Ltd (“REGIVE”) is an authorised financial service provider (FSP: 50522) and incorporates TCF into the way that it conducts business every day and the way it deals with clients. Our approach to TCF is reflected into the following organizational structures and processes:

**LEADERSHIP:** The Board and management provide direction and monitor the delivery of TCF behaviors and outcomes.

**STRATEGY:** The TCF aims are not merely stated vision and values, but built into our strategic and business plans.

**DECISION-MAKING:** Decision-making protocols ensure that all 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.

**PERFORMANCE MANAGEMENT:** Our staff and representatives are trained to deliver appropriate TCF outcomes. TCF deliverables form part of our staff performance contracts and performance is evaluated in terms of TCF competence and expectations.

**REWARD:** Our remuneration, incentive and reward policies take cognisance of fair customer outcomes and ensure that conflicts of interest are avoided.

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## THE SIX TREATING CUSTOMERS FAIRLY FAIRNESS OUTCOMES

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We have incorporated the following 6 TCF outcomes into our business operations:

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

The Board and management integrated the implications of TCF in enterprise risk management policies, and ensuring such is communicated to staff.

In terms of the section 2 of the FAIS General Code of Conduct we must always render financial services honestly, fairly, with due skill, care and diligence and in the interests of clients and the integrity of the financial services industry.

All parties and businesses that REGIVE contracts with are put through a thorough due diligence process before contracting.

**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.**

REGIVE currently does not market products to retail clients. Our funds are suitable for sophisticated and professional investors, with risk tolerance and ability to invest for long time period. Interests in the funds will be subject to restrictions on transfer and investors must be prepared to bear such a liquidity risk for the lifetime of each fund.

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

We use clear explanation of each product when talking to our clients with the mechanics and risk profile of the product disclosed to them in plain language. REGIVE will keep accurate, secure and retrievable product information and disclosures supplies to clients, as well as any other relevant interactions.

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

REGIVE is an advice-led solutions provider. We always consider the appropriate advice required in order to sell or market any of our products. Due to complexity of some of our products, we always request a resolution from our clients that states that they have received appropriate advice before investing in any of our products.

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

We offer advisory and multi-manager solutions, thus we have partnered with a best-of-breed underlying product and administration service providers to ensure appropriate, accurate and objective product performance. All investments must pass rigorous investment process and due diligence before investments ensue.

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

REGIVE clients are informed in advance of any changes that may be made to their products should circumstances change, as well as any important limitations. We make it a priority to assist clients who have complaints. All decisions regarding complaints are to be objective, consistent and without any conflict of interests. Responses to complaints should be followed up to ensure client satisfaction and fair treatment. Complaints are further analysed in order to identify potential risks or mis-selling and to assess the appropriateness of the firm's products and services for the clients concerned.