



TCF (TREATING CUSTOMERS FAIRLY) POLICY

CONSEQUENCE PRIVATE WEALTH (PTY) LTD

Registration: 2009/005302/07

1. Business and Contact Details

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2. Aim

The aim of this policy is to give clear and concise guidelines to all stakeholders and to ensure that customers are treated fairly within in the six principles of “Treating Customers Fairly”.

3. Scope

This policy shall apply to all persons who deal with customers of the FSP. The policy covers our commitment to providing the highest standards of customer-centric financial services. It will cover how the Treating Customers Fairly principles (TCF) are applied across all business sectors in the course of our general business activities.

4. Introduction

The company believes that the fair treatment of customers is essential to the success of its business. Customers are our most valuable asset and are a key stakeholder in the business, both directly, where our customers are intermediaries, or the customers of such intermediaries and because of the influence the quality of the customer experience has on the businesses’ relationships with other stakeholders.



We are fully committed to providing the highest standards of customer-centric financial services and our aim is to ensure we deliver a user-friendly, robust, reliable and cost-effective service. Treating Customers Fairly principles (TCF) are applied across all business sectors in the course of our general business activities.

Our treating customers fairly (TCF) policy is centred around the guidance provided by the Financial Services Conduct Authority (FSCA) to ensure we consistently deliver fair outcomes to our customers and take responsibility for the business and staff (at all levels) providing an enhanced service quality to customers, based on a culture of openness and transparency.

This Policy Statement has been prepared in order to document the various controls and processes that exist enabling the business to demonstrate compliance with the six desired outcomes of the FSCA's 6 TCF Principles.

ONE	Customers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture
TWO	Products and services marketed and sold in the retail market and designed to meet the needs of identified consumer groups and are targeted accordingly.
THREE	Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale
FOUR	Where consumers receive advice, the advice is suitable and takes account of their circumstances
FIVE	customers are provided with product that performs as firms have led them to expect, (product integrity) and the associated service is both of an acceptable standard and also as they have been led to expect.
SIX	Customers do not face unreasonable post sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.
We have set out below how we aim to ensure these principles are embedded in our daily operations	

5. General Application

In general terms for the different areas of our business this means:

- Encouraging and responding to valuable customer feedback allowing us to continually improve our service offering.
- Ensuring that promotional material issued is clear, compliant, jargon free and appropriately targeted.
- Ensuring that we support our intermediaries in proper product provider and products selection.
- Ensuring an ongoing flow of customer pertinent information which is relevant and timely.



- Ensuring that staff have thorough training on all products they provide services on, are able to assist intermediaries, understand who they are and aren't suitable for, and are encouraged to provide feedback where they spot inconsistencies, ambiguities or potential unfairness in the product literature or product features.
- Operating remuneration systems which assure fairness to the customer as well as customer satisfaction.
- Finding ways to encourage staff to implement TCF in their day to day business activities.
- Keeping detailed records of customer instructions and the required financial services we have been requested to assist with, to help ensure we treat customers fairly and can deal with any complaints that may arise swiftly and fairly.
- Encouraging feedback from intermediaries and end user customers where appropriate to correct or improve on the service already offered.
- Ensuring that customer complaints are assessed fairly, promptly and impartially, and in line with deadlines and rules.
- Encouraging staff to recommend improvements to service following customer complaints – and monitoring the outcome.
- Ensuring 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.
- Offering regular training in the principle of TCF at all levels of the business.
- Regularly monitoring and reporting on all of the above TCF activities as part of the company's monthly statistics/MI, in order to assess TCF performance across the business and recommend changes where appropriate.
- Ensuring that TCF values, which are set and communicated by Senior Management, are supported by all staff and understood in the same way.

6. TCF Principles

ONE	<i>Customers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture</i>
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Customer-centricity - Our priority from a strategic and operational perspective is to provide our customers with excellent service underpinned by quality and choice. We are committed to ensuring our employees, customers and advisers prefer and retain our services throughout the entire value chain of financial services.

Conflicts of Interest - Consequence Private Wealth is committed to ensuring its business is conducted in a way which is legal, professional, fair and in accordance with the best interests of its customers.

We have adopted this Conflict of Interest Policy which is regularly monitored and reviewed. The policy provides guidance and sets out various requirements for all employees (including the offering and receiving gifts and hospitality) as well as oversight of relationships with customers and suppliers.



We do not engage with end user customers, and provide all financial services to the appointed intermediary, as agent to the customer. We identify potential conflicts of interest within our business process and ensure that individual and business objectives are linked to quality service, TCF and regulatory compliance.

We acknowledge that should conflicts of interest arise either:

(a) between our interests as a business and those of customers; or

(b) between the personal interests of a team member and those of the customer; either because of a relationship, or a financial incentive or inducement we offer, or which is offered by any third party, these will be managed in accordance with our internal policy.

We will neither seek nor accept anything that may influence, or appear to influence, any of our business decisions. We may accept limited business courtesies such as meals, entertainment or business support provided they are customary, commonly accepted and are offered with no express or implied understanding of creating an obligation on us by the act of acceptance. These are recorded in our gifts register, a copy of which is available on request.

TWO	<i>Products and services marketed and sold in the retail market and designed to meet the needs of identified consumer groups and are targeted accordingly.</i>
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Our service is shaped by examining and understanding our customers' needs and priorities and providing our intermediaries with support and guidance in this regard. To achieve this, we ensure we have appropriate knowledge and understanding of needs and requirements throughout the entire value offering inherent in the provision of financial services.

We constantly pursue ways to improve the quality of our service where this is possible and ensure that we engage in a fair and efficient service level agreement, in order to be able to measure this. We encourage, and where appropriate act upon stakeholders' comments and suggestions for improvement in our service and invite all our customers to provide us with valuable feedback.

THREE	<i>Consumers are provided with clear information and are kept appropriate informed before during and after the point of sale</i>
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Transparency - We ensure our services are delivered with clarity and transparency and do not contain hidden conditions or rely on complex technical definitions.

We will fully supply information to relevant parties in order to provide an environment conducive to informed consent. We will ensure our intermediaries are enabled to ensure customers have all the information they require in order that they can make an informed decision in relation to the financial service under consideration.

Policy Literature/Financial Promotions - It is essential that policy literature and financial promotions issued are clear, fair and not misleading; thereby accurately reflecting the product being offered.



FOUR	<i>Where consumers receive advice, the advice is suitable and takes account of their circumstances</i>
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Third Party and Product Provider selection – As mediators of products designed by third party suppliers, our concern is to ensure that our product portfolio meets the following requirements:

- the supplier is of adequate financial standing and will enable us to fulfil our core values
- the products are suitable to our potential customers.

Our providers are selected on a criteria acceptable to the principles inherent in TCF and include aspects such as financial strength, expertise in core business, underwriting and claims-settlement, service requirements, breadth of coverage, continuity and relationship, fit with overall risk management programme, pricing and relevant terms and conditions.

We are committed to the provision of insurance solutions and products which will be:

- driven by what is in our customer's best interests
- underwritten by approved product providers

We provide our intermediaries with information about the outcome of sales to inform their decisions on the product portfolio and our assessment of the fair treatment of our customers.

We assist where possible and equip our distribution with sufficient information so as to provide our customers with appropriate, professional advice concerning their insurance needs and requirements.

We provide our distribution with adequate training and support, as well as management information where appropriate, to assist them in performing their functions fairly and efficiently.

Policy literature is subject to Quality Assurance processes and is reviewed regularly. In doing so, we ensure an outcomes-based approach to TCF is adopted and that various regulatory and statutory obligations are complied with.

FIVE	<i>customers are provided with product that performs as firms have led them to expect, (product integrity) and the associated service is both of an acceptable standard and also as they have been led to expect.</i>
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We regularly review product terms and conditions and all customer feedback and engage with product suppliers to redress imbalances against customer expectations.

We keep our customers fully informed in a clear and fair manner that is unambiguous and not misleading and work hard to ensure that service and risk information remains clear and prominent at all times.

We satisfy ourselves of our approved product suppliers' ability to meet the obligations inherent in their products and to provide aftersales care, and other relevant capabilities, in our selection process. Where applicable, we ensure the provision of such aftersales service in accordance with customer expectation.

We utilise available management information to identify and respond to aftersales performance matters.



SIX	<i>Customers do not face unreasonable post sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.</i>
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- We keep our customers informed of the types of changes they may make to their products if their needs or circumstances change, and of any important limitations on their ability to access funds or make changes going forward.
- These are aligned to clear service standards for processing product changes. We implement demanding but achievable service level agreements, agreed internally and with our business partners, which are constantly monitored to ensure customers receive the level of service they expect.
- Where a request for a product change is declined by any party in the value chain, we provide clear reasons for this
- Where we receive a request to change a product (whether directly or through another party) we inform the customer of any potential risks associated with the change, in reasonable time for them to respond to or act on the information
- Claims Handling - We operate efficient (including paperless) claim procedures to ensure that customer claims are handled promptly. Our distribution is clearly informed of this process and the requirements of this.
- Complaints - We respond in a timely manner to our customers' and prospective customers' questions and queries and address any issues or concerns promptly. All customer complaints are dealt with and escalated as appropriate and as required by us in order to meet our obligations to our clients and our regulator.
- We are happy to provide full details of our complaints process on request.
- Complaints - Root Cause Analysis and Outcomes Testing - We have detailed complaints handling procedures and training in place that are in compliance with FSB rules and guidelines. This ensures all customer service employees are able to identify complaints and complaints handlers investigate complaints, competently, fairly and consistently in line with the prevailing policies and procedures.
- Regular reporting in terms of outcomes testing will ensure that trends are identified, recorded and discussed to determine if any remedial action is required, either against individuals, products, policy wordings or processes.



7. Identifying Conflicts of Interest

To adequately manage conflicts of interest, the business must identify all relevant conflicts timeously.

Two levels of identification are employed:

Business level: The managing body will annually identify an index of potential conflict risks. The index is updated with all new conflicts identified, and to ensure completeness is reviewed on an annual basis;

Employee level: All employees, including compliance officers and management, are responsible for identifying specific instances of conflict and are required to notify their manager of any conflicts they become aware of. They are further required to disclose all conflict of interest as they may arise and where there is no conflict of interest attest to the fact.

8. TCF Governance

All Company employees are encouraged to take responsibility for TCF in the course of performing their individual roles.

Senior Management:

- prescribes management information disciplines which allow regular score-keeping against our TCF and sales process quality objectives
- ensures team members' role responsibilities clearly set out their TCF and regulatory compliance objectives
- ensures there is available to all relevant team members training and coaching which equips them to understand their responsibilities
- regularly reviews and moderates remuneration schemes and attendant performance objectives to ensure consistency with the businesses' TCF approach
- ensures that we rigorously promote our customer core values, in all available training interfaces with our team members, to embed a culture of Treating Customers Fairly
- ensures that our incentive schemes reward and recognise excellence in providing a quality sales experience to the customer, embracing the fair treatment of customers.

TCF Management Information:

- TCF Management Information (MI) Reporting, Review and Escalation.
- A detailed TCF MI report is to be produced on a quarterly basis and analysed as part of the Compliance Monitoring Programme with appropriate input from the business areas where issues or anomalies are identified. This ensures there is an adequate "bottom-up" review of the TCF data.
- A summary of the data is then presented to the Managing Body on a quarterly basis as a standing agenda item. This enables robust "top-down" challenge and review of the business' performance against TCF outcomes.
- Ad hoc reviews of TCF ensure TCF processes continue to be appropriate and TCF MI remains 'fit for purpose'.

September 2019

Michael Furter