



Treating Customers Fairly

RealFin Collective Investment Schemes (RF) Proprietary Limited (“**RCIS**”) is committed to ensuring that the Financial Sector Conduct Authority’s (“**FSCAs**”) initiative of “Treating Customers Fairly” (“**TCF**”) is embedded in all areas of our business. As part of our overall approach, we are fully committed to treating our customers fairly and as such and due to our obsession with perfection, we endeavour to meet their expectations of high quality service.

Our clients are our most valuable asset and our aim is to;

- protect the interests of our clients at each stage of the investment process;
- endeavour to meet our clients’ expectations of high quality service.

Our TCF policy is centred around the guidance provided by the FSCA to ensure we consistently deliver fair outcomes to our clients and take responsibility for the company and staff (at all levels) providing an enhanced service quality to clients, based on a culture of “living compliance” as well as a culture of openness and transparency.

FSCA Guidelines – Six Outcomes

Our TCF Policy is centred on the FSCAs guidelines and the six outcomes produced:

Outcome 1

Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.

- TCF has been entrenched within the RealFin Group and ‘conduct risk’ of which TCF form a part of, has been incorporated into Board meetings.
- Our TCF policy is reviewed at least annually and approved by the Board of Directors.
- Our clients are our most valuable asset and we are committed to protecting their interests. We will at all times render services honestly, fairly, with due skill, care and diligence and in the interest of clients and the integrity of the collective investment scheme industry.
- We will ensure the fair treatment of clients. Co-Named Funds will be designed together with applicable Investment Managers and we will ensure that it would meet current client needs.
- We have considered the cost of fees to clients and will ensure all fees and charges are transparent and fully disclosed to our clients.
- Due diligences of service providers will be undertaken at inception (including the integrity of key persons) before engaging with them. Annual due diligences will furthermore, be conducted, as well as ongoing monitoring undertaken in order to evaluate service delivery against service level agreements.
- We will continuously ensure that all staff members fully understand the Six Outcomes.



Outcome 2

Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly.

- We do not engage in marketing. Funds are however marketed and sold by Investment Managers and Independent Financial Advisors where applicable. RCIS therefore undertake due diligences of service providers at inception and annually and ensure they have the requisite licence.
- Co-Named Funds will be designed together with applicable Investment Managers and we will ensure that it would meet current client needs.
- We oversee the marketing materials developed by applicable service providers.
- Minimum Disclosure Documents ("MDD") discloses the risk rating of portfolios, which allows consumers to make a decision based on their risk appetite.

Outcome 3

Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale.

- We will as part of our due diligence process ensure that Investment Managers and Independent Financial Advisors are duly authorised Financial Services Providers, given that they will engage with the vast majority of investors on an individual basis prior to them investing, they are in a position to provide a reasonable and appropriate general explanation of the nature and material terms of the relevant Co-Name Fund to a client, and generally make full and frank disclosure of any conflicts of interest and any information that would reasonably be expected of an FSP to enable the client to make an informed decision.
- MDDs of each Fund are detailed and updated regularly in order to remain current.
- The factual data of the MDD and any marketing material will be reviewed by RCIS for quality as well as the requirements of Board Notice 92 to ensure any advisor has factually correct information to provide to prospective clients.
- The end customer is the client of the Investment Manager. The end customer has a direct relationship with the Investment Manager who is accessible to the client.
- Where a Fund is available to the public, the MDD will be available on RCIS' website and should clients require any further information on products, they may contact the Investment Manager or utilise the following designated email address - clientservices@realfin.co.za.
- We will ensure that client communications are clear, concise, unambiguous and not misleading and will ensure that clients receive investment statements on a monthly basis.

Outcome 4

Where consumers receive advice, the advice is suitable and takes account of their circumstances.

- RCIS does not render financial advice. We however undertake due diligence processes of Service Providers at inception and on an annual basis and ensure they have the requisite licence to render financial services in respect of our Funds.



- MDDs of each Fund are detailed and updated regularly in order to remain current and are provided to contracted parties.

Outcome 5

Consumers are provided with products that perform as firms have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect.

- We do not create any performance expectations with investors and it is clearly stated on all marketing material that past performance is not an indication of future performance. Furthermore, we do not provide any guarantees either with respect to capital or returns.
- The Investment Manager/independent financial advisors meet with clients and this provides a forum to obtain feedback from the client on products/ services provided and whether it is in line with the clients' expectations.
- Service Providers due diligences will be undertaken at inception, ongoing monitoring performed and due diligence undertaken on an annual basis in order to evaluate service delivery against service level agreements.
- We will ensure that detailed fund MDD's are produced monthly or quarterly, clearly detailing composition, costs and performance.

Outcome 6

Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.

- Investor queries are routed through either the RCIS's client services or they have direct dealings with the Investment Manager. Both parties deal with instructions from clients in an efficient and fair manner.
- We do not impose penalties should an investor wish to withdraw or change products.
- There are no hidden fees or charges.
- All forms for reinvestment, switching and disinvestment are available for investors on RCIS' website. Application forms will contain all the terms and conditions and timelines involved in processing of client's instructions.
- Our complaints process is clear and easy to understand. We will deal with customer complaints with seriousness and have a Complaints Policy approved by our Board of Directors should clients wish to lodge any complaints. The Complaints Policy is available on our website and on request.

Our Commitment

- We will disclose all costs with regards to our product offering;
- We will make sure that the client understands the product and any risks associated with it;
- We will ensure that all conflicts of interest are clearly disclosed to enable the client to make an informed decision;
- We will ensure that all client communications are clear, concise, unambiguous and not misleading;
- We will continuously ensure that all staff members fully understand the Six Outcomes detailed above;
- We will listen to client feedback and will deal with any complaints timeously;
- We will ensure that an agreement is signed between ourselves and the client detailing the extent of our services;
- Where a breach has taken place, we will rectify the situation so that the client is not prejudiced;



- We will ensure that detailed fund minimum disclosure documents are produced quarterly for funds clearly detailing composition, costs and performance.

Complaints policy

We respond in a timely manner to our clients and prospective clients' questions and queries and address any issues or concerns promptly.

RCIS have systems in place to deal with client complaints which will be escalated as appropriate and as required by us in terms of the Collective Investment Schemes Control Act, No. 45 of 2002 ("CISCA") in order to meet our obligations to our clients and our regulator, the FSCA.

Our full Complaints Policy is available on request.

Staff

We recognise that our employees are critical to delivering a positive client experience and ensuring our clients are treated fairly. Our culture and values encourage and support our employees to deliver this. As such, all of our employees are fully trained in dealing with our clients, and in treating them fairly and in particular, we will continuously ensure that all staff members fully understand the Six Outcomes detailed above.

We remunerate and incentivise our employees to encourage them to deal with all clients fairly, and continually to find ways to improve. Furthermore, bonuses are paid annually and are determined by the profitability of the company and the qualitative and quantitative performance of staff members.

Client Feedback

We welcome client feedback on our products/services provided and whether it is in line with their legitimate expectations.

www.realfin.co.za