



TREATING CUSTOMERS FAIRLY (“TCF”) POLICY

MARCH 2022

TCF Statement

This policy was designed to suit the Company’s specific profile of being a registered financial services provider (“FSP”) with the Financial Services Board (“FSB”), with a variety of clients and products. In addressing Treating Customers Fairly (“TCF”), our policy has been drafted in conjunction with the recommendations made by the FSB.

This document serves to show our commitment to our clients in accordance with the Financial Services Board’s initiative of TCF.

Desired Outcomes

Our TCF Policy is centred on the Financial Services Board’s guidelines and the six outcomes which are produced below:

At Axiomatic, we strive to ensure fair business practice and to consistently deliver fair outcomes for our customers. We comply with the TCF framework and all the associated legislative and regulatory requirements to ensure that we enhance the business focus on customers, and apply TCF principles across all business functions that provide intermediary and advisory services to our clients.

The six TCF outcomes integrated in our business model are listed below.

Outcome 1	Trust	Clients are confident that we have their best interests at heart
Outcome 2	Needs met	Clients are advised on products and services that meet their needs at every life-stage

Outcome 3	Clear information	Clients receive clear product information that is easy to read, easy to understand, not misleading, not concealing or missing important information
Outcome 4	Appropriate advice	Clients receive advice that is suitable for them and takes their personal circumstances into account.
Outcome 5	Expectations met	Clients experience products and service that perform according to the expectations they have shared with us and we have understood
Outcome 6	No unreasonable barriers	Clients do not experience any unreasonable barriers to getting claims paid; to changing products; to switching providers; or to getting their complaints fairly resolved.

Our Commitment to TCF:

At Axiomatic we will aim to demonstrate through our behaviour and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle to which we contribute as follows:

Trust

At Axiomatic we pride ourselves on our commitment and service to our clients. If we didn't have any clients, we wouldn't have a business. As a result, we have embedded in our company, a culture of trust and reliability. It is part of our DNA.

Axiomatic and its staff are invested alongside our clients in our own products. This partnership effectively forces us to "break China for the client". To labour the point, we share in our client's upsides and downsides. As professional advisors, if the product is good enough for us, it's good enough for our clients as well.

All our members of staff are trained to deal with our clients and are committed to maintaining very high standards of service and will continuously ensure that all staff members fully understand the Six Outcomes as detailed above.

Axiomatic fosters a culture of meritocracy. The success of the staff is aligned with the success of the business, as we want our employees to think and act like an owner. We believe that our staff remuneration is structured in such a way that it encourages them to deal with our clients in a fair and unbiased manner.

Needs are met:

We develop, recommend and sell a product when we believe that a new mandate can sustainably meet a clearly defined client need, and in areas where we have adequate capacity, resources and expertise to deliver results over meaningful periods.

Our products have been developed in a way that the fees payable by clients are reasonable and fair and are not structured in a way that gives rise to up-front charges, hidden penalties, and unreasonable ongoing fees. Further, all fees are disclosed to clients upfront.

We will ensure that all Authorised Representatives have received training on the products being recommended to ensure they understand to which client group each product is most appropriate.

Clear and Appropriate Information:

- ✓ Clients are presented with an introductory letter informing the client of pertinent facts relating to the appointment of Axiomatic as their advisor.
- ✓ We perform a Full Needs Analysis upfront, to ascertain the client's details, financial status and financial needs.
- ✓ We disclose all costs and risks involved with the product being recommended.
- ✓ We make sure that the client understands the advice and any risks associated with any product recommended.
- ✓ We ensure that all Conflicts of Interest are clearly disclosed to enable the client to make an informed decision.
- ✓ We ensure that all client communications are clear, concise and free of jargon. Small print is avoided where possible.
- ✓ Senior Management reviews all promotional material for quality and compliance prior to being issued publicly.
- ✓ We will ensure that a mandate is signed between ourselves and the client detailing the extent of our discretionary services.
- ✓ Engagement with our clients takes place on an ongoing basis through frequent interaction at client meetings.
- ✓ A dedicated Business Development Manager or Client Account Manager ensures that client requests for information are attended to timeously.

Appropriate Advice:

We strive to give our clients an excellent understanding of our products through regular communication and presentations.

Where advice is provided, advisors 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.

We ensure that all Axiomatic employees furnishing advice to clients are registered with the FSB and where they may be under supervision, that this fact is disclosed to clients.

Expectations met:

We provide clear and fair information to enable customers to make informed decisions about transacting with Axiomatic, our products and services. Product risks, commitments, limitations and charges must be transparent.

We provide customers with ongoing relevant information to enable them to monitor whether the product or service continues to meet their needs and expectation, and provide acceptable levels of service for post-sale transactions or enquiries.

Where necessary, we conduct annual reviews with our clients to ensure that their expectations are met and their needs understood. This allows us to manage our relationship our clients with their best interests in mind.

No unreasonable barriers:

We 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 to be fair and consistent with handling of claims and a mechanism to deal with complaints timeously and fairly.

- ✓ All new clients are familiarised with our Customer Complaints procedures, which is disclosed in the Client Introduction Letter that is presented to them at the beginning of the relationship.
- ✓ We will listen to client feedback and will deal with any complaints timeously.
- ✓ Our Customer Complaints Policy and Customer Complaints Form are readily available on our website.
- ✓ Complaints are treated seriously and will be escalated to a Manco member.

Other examples of TCF principles evidenced in our approach to daily business:

- ✓ We do not favour any products or service providers over and above others.
- ✓ We continue to place a high priority on ensuring that we comply with all regulatory and statutory obligations, as well as industry best practice.
- ✓ Where a breach of mandate has taken place we will rectify the situation so that the client is not prejudiced.
- ✓ We encourage and welcome feedback from staff and customers on our services and procedures.
- ✓ Before we engage with a third party we will satisfy ourselves of their commitment to treating customers fairly through consideration of their TCF policy and information that they can provide to demonstrate the fair treatment thereof.
- ✓ A TCF register is kept to record any TCF concerns together with the manner in which it was resolved. This register is reviewed by Senior Management on a regular basis.
- ✓ We will continue to review our TCF policy on an ad hoc basis and at least annually.

For any queries or feedback relating to our Treating Customers Fairly Policy, please feel free to contact us at:

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