



TREATING CUSTOMERS FAIRLY POLICY

PURPOSE OF TREATING CUSTOMERS FAIRLY (HEREAFTER “TCF”)

The financial services industry is moving away from rules towards a more principles-based approach in terms of regulatory supervision and focuses on institution's conduct to delivers desired outcomes. To proactively identify risks and trends, and then be pre-emptive actions to avoid a risk happening rather than deal with the consequences after the fact. This approach includes checking and demonstrating the customer fairness outcomes envisaged through TCF and its focus is on market conduct. Fair treatment of customers underpins the GCoC for FSPs and Representatives.

The TCF framework

1. Improved customer confidence;
2. The supply of appropriate products and services; and
3. Enhanced transparency and discipline in the industry.

THE SIX TCF OUTCOMES

TCF Outcome 1: Principle of Culture & Governance

TCF Outcome 2: Principle of Product Suitability

TCF Outcome 3: Principle of disclosure

TCF Outcome 4: Principle of Suitable Advice

TCF Outcome 5: Principle of Performance and Service in line with Expectations

TCF Outcome 6: Principle of Claims, Complaints & Changes.

TCF OUTCOME 1: PRINCIPLE OF CULTURE & GOVERNANCE

As a part of the business's framework, TCF is embedded in the business plan of Helfin Global Capital (Pty) Ltd ("Helfin Global"). This can be evidenced in the business' business plan, the strategies and the values of Helfin Global, employees, management and leadership, and decision making. All employees are trained on the outcomes in the performance of the TCF principles. Staff signs training registers as proof thereof. The Key Individuals will ensure that proper due diligence is done on product and service providers before contractual agreements are signed with them. Helfin Global also conducts due diligence to ensure that the product or service provider is listed and registered. Information will frequently be collected to ensure that proper procedures, processes, and controls are in place. The information gathered will be evaluated to monitor the success of the business' TCF strategy and objectives.

1. Ethical culture
2. Good performance
3. Effective control
4. Legitimacy

TCF OUTCOME 2: PRINCIPLE OF PRODUCT SUITABILITY

Part of promotion and marketing, Helfin Global ensures that it conducts due diligence on products of product providers to establish whether the products offered meet the business' objectives as well as the needs of prospective clients. This is done by doing thorough research on the product, the features of the product supplied, the risks associated with the product, and knowing how the product will meet the need of prospective clients.

Helfin Global makes use of client segmentation to match the products with the necessary target audience. Thereafter Helfin Global Capital (Pty) Ltd conducts a suitability analysis through an overview of the:

- business's client portfolio
- business's product portfolio and then
- match the needs and risks of each client group with a specific product

When marketing is done we ensure that we are:

- geared towards target clients
- clear and not misleading
- in plain language and understandable to the client

TCF OUTCOME 3: PRINCIPLE OF DISCLOSURE “TCF AT THE POINT OF SALE”

We acknowledge that certain principles need to be adhered to at the point of sale and therefore ensure product risks, commitments, limitations, and charges are transparent to the client by informing them of these risks. We give clients clear information in easy to understand and in the plain language since we acknowledge that we need to assist with enhancing the client's financial literacy and assist them to make an informed decision on the information provided to them. Clients are appropriately informed before, during, and after the time of contracting.

All information distributed to clients is approved by management before being sent. Proper due diligence is done to ensure that we only contract with reputable businesses who comply with FAIS disclosure requirements. The information distributed is in a plain, easily understandable language that is relevant to the clients and the target market of Helfin Global.

Should there be updates and/or changes to products, information on this is obtained from the Product Provider and distributed to clients. Client details are checked on an annual basis at the client's review and are constantly updated. All client details can be accessed on Elite.

The disclosure letter complies with the General Code of Conduct, 80 of 2003 for Authorised FSPs and Representatives.

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TCF OUTCOME 4: PRINCIPLE OF SUITABLE ADVICE

Helfin Global ensures that advice that is given to clients is suitable to the needs of the client concerned by following the following advice process.

The Advice Process:

- 1.1. Establishment and defining of the professional relationship between the client, the broker, and Helfin Global. The client is presented with Introduction letters and a disclosure that confirms that Helfin Global is authorized for discretionary intermediary services and registered at the FSCA.
- 1.2. Helfin Global will establish a Service Agreement between the business and client that will be signed and agreed upon by both parties.
- 1.3. Helfin Global will enter into a discretionary mandate with the client, setting out the investment objectives of the client.

TCF OUTCOME 5: PRINCIPLE OF PERFORMANCE AND SERVICE IN LINE WITH EXPECTATIONS

Once the sale has gone through Helfin Global will provide clients with ongoing relevant information and provide acceptable levels of service for post-sale transactions or inquiries as they are received. Helfin Global will monitor and respond to changes in the wider environment that may affect products and impact on particular groups of clients. Helfin Global will also ensure that clients are provided with products that perform as the business has led them to expect. Helfin Global ensures services are both of an acceptable standard and what the client has been led to expect from the business.

In terms of product, performance monitoring and communication we focus on:

- Risk Management
- Operational ability and capacity
- Outsourcing functions
- Business continuity
- Recordkeeping

TCF OUTCOME 6: PRINCIPLE OF CLAIMS, COMPLAINTS & CHANGES.

Helfin Global will ensure the business honors representations, assurances, and promises that lead to legitimate client expectations.

We will minimise unreasonable post-sale barriers by ensuring that queries and complaints are handled in a timeous manner and that we respond to clients as soon as possible. We will ensure fair and consistent handling of claims within the six weeks and our complaints management policy will also be made available to the clients as and when required. We have developed a mechanism to deal with complaints timeously and fairly. When a complaint is received by any person in the office the complaint will be escalated to the key individual who will deal with the complaint and the client. The client will be requested to put the complaint in writing, the complaints management policy will be made available and the complaint will be recorded in the complaints register. This will all be done within the six week time period where Helfin Global will do everything possible to handle the complaint.

Accepted for and on behalf of Helfin Global, and duly authorized

Name and Surname Michael Papageorge

Signature

Designation Director

Signed at Pretoria

Date 2024-05-08

TRAINING REGISTER

Name & Surname	ID Number	Date	Signature