



## **TREATING CUSTOMERS FAIRLY (TCF) POLICY**

**JUNE 2023**

### **PURPOSE AND SCOPE**

The Treating Customers Fairly (TCF) initiative is a key component of the Financial Sector Conduct Authority's broader consumer protection and market conduct mandate. TCF is an outcomes-based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms. Independent Alternatives Investment Managers (Pty) Ltd ("FSP") incorporates TCF into the way that we conduct business every day and in the way that we deal with our clients. We may not outsource this responsibility to another party, although our compliance officer may provide guidance and assistance with regards to incorporating TCF into our business.

#### **1. Policy Statement**

At Independent Alternatives, we put our clients at the very heart of all that we do. We are client centric, and endeavour to always put our clients first. We are fully committed to providing the highest standards of client service whilst providing a market beating investment experience. We are fully committed to treating our clients fairly and as such we endeavour to meet their expectations of high-quality service.

Our Treating Customers Fairly (TCF) policy is centred around the guidance provided by the FSCA, FAIS and our Compliance Officer, to ensure we consistently deliver fair outcomes to our clients and take responsibility for the firm and staff (at all levels) providing an enhanced service quality to clients, based on a culture of openness and transparency. As a firm, we take the requirements of the FSCA & FAIS extremely seriously, in particular, the requirement to treat customers (clients) fairly.

**The FSCA & FAIS have outlined six key outcomes, which are central to our TCF initiative:**

OUTCOME 1	Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture.
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.
OUTCOME 3	Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
OUTCOME 4	Where customers receive advice, the advice is suitable and takes account of their circumstances.
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.
OUTCOME 6	Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

## **2. Our Service**

We ascertain the appropriateness of the requested product for all new clients prior to accepting an instruction, ensuring it is in line with their knowledge and experience. We continually aim to understand the needs of our clients. We keep our clients fully informed in a clear and fair manner that is unambiguous and not misleading.

We ensure our products and services are delivered with clarity and transparency and do not contain hidden conditions or rely on complex technical definitions. We make certain our clients understand the risks associated with our products. We work hard to ensure that risk information remains clear and prominent always. If there is a conflict of interest, we will inform our clients as soon as possible once we become aware of it.

## **3. Our approach**

Our priority is to provide our clients with market leading investment products. We are committed to ensuring our employees, customers and advisers want to buy our services, stay with us, and recommend us to their families, friends, and colleagues.

We aim to treat our clients fairly and deliver high quality investment products which meet their expectations throughout their relationship with us. We recognise that our employees are critical to delivering a positive client experience and ensuring our customers are treated fairly. Our culture and values encourage our employees to deliver this.

All of our employees are fully trained in dealing with our clients, and in treating them fairly. We remunerate and incentivise our employees to encourage them to deal with all clients fairly, and to continually find ways to improve.

## **4. 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 appropriately and as required by us in order to meet our obligations to our clients, our regulator and the Ombud. We are happy to provide full details of our complaints process on request.

Our policy is in line with the current guidance from the FSCA and is in line with the principles of the FSCA that: "A firm must pay due regard to the interests of its customers and treat them fairly."