



ROSEBANK
WEALTH GROUP
Clients First. Always.

FSP 41055

REGISTRATION NUMBER: 2009/011830/07

TCF POLICY DOCUMENT

INTRODUCTION

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.

Rosebank Wealth Group (RWG) incorporates TCF into the way that we conduct business every day and in the way in which 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.

Our approach to TCF is reflected into the following organisational structures and processes:

Leadership: The Board and management provide direction and monitor the delivery of TCF behaviours and outcomes.

Strategy: The TCF aims are not merely stated vision and values, but built into our strategic and business plans.

Decision-making: Decision-making protocols ensure that all decisions that impact on customers are subject to the challenge implicit in our TCF strategy.

Governance and controls: Our governance structures and control mechanisms are designed to cater for TCF considerations and include TCF measurement systems and identification of TCF risks.

Performance management: Our staff and representatives are trained to deliver appropriate TCF outcomes. TCF deliverables are at the core of the service we offer and form part of our staff

performance contracts and performance is evaluated in terms of TCF competence and expectations.

Reward: Our remuneration, incentive and reward policies take cognizance of fair customer outcomes and ensure that conflicts of interest are avoided.

THE SIX TREATING CUSTOMERS FAIRLY FAIRNESS OUTCOMES

We have incorporated the following 6 TCF outcomes into our business operations:

Outcome 1: Customers are confident that they are dealing with a firm where the fair treatment of customers is central to the firm culture.

- a. Clients are at the core of RWG's operations, as denoted by our tag line *Clients First. Always.*
- b. This ethos is driven from the top down and all employees are made aware of the company's philosophy when it comes to interacting with clients.
- c. In terms of section 2 of the FAIS General Code of Conduct we must at all times render financial services honestly, fairly, with due skill, care and diligence and in the interests of clients and the integrity of the financial services industry. Compliance with the appropriate legislation, standards and codes is incorporated into all steps of RWG's advice process.
- d. TCF is the responsibility of everyone across the organization.
- e. RWG has a conflict of Interest Policy in place and this policy provides scope to deal with any such conflict that should arise.

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.

- a. RWG conducts a needs analysis and risk assessment whenever meeting a new client, based on this needs analysis and risk assessment, appropriate advice is given.
- b. All of RWG's client facing staff members have passed the necessary regulatory exams, required in order to render advice. RWG examines any and all products before offering them to clients, to ensure that the client's best interest is front and centre.
- c. In addition, RWG employs the services of a 3rd party investment manager who provides DD services. All investments are scrutinised before recommending them to clients.
- d. In terms of Section 8 of the FAIS General Code of Conduct we must do a suitability analysis prior to providing a client with advice. By completing a needs analysis and risk assessment for all clients, RWG complies with this requirement.
- e. In terms of section 4 of the FAIS Discretionary Code we must - prior to entering into a written or electronic mandate with a client - obtain information with regard to the client's financial circumstances, needs and objectives and such information that is necessary to enable us to render suitable intermediary services to the client. Our needs analysis and risk assessment cover this requirement.
- f. Portfolios/Solutions are recommended to clients based on their income needs, risk tolerance, age, financial goals etc.
- g. The use of a platforms or wrap provider is considered on a client by client basis. This selection ensures that the investment strikes a balance between cost and operational efficiency.
- h. As part of our advice process, we ask to know about a client's total investment portfolio in order to ensure that the investments we recommend are complimentary to their existing holdings.

- i. All clients are put through a KYC process which identifies who the ultimate beneficial owners are in each instance and all KYC documents are verified used the *DocFox* platform.

Outcome 3: Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.

- a. The rationale and detail surrounding each investment is clearly explained beforehand to the client.
- b. The risks, potential returns and fees of each investment product are disclosed upfront before a client is invested in them.
- c. We manage the investment process on behalf of our clients and as and when product suppliers require further information/documents we manage the admin burden on their behalf.
- d. In terms of section 7 of the General Code of Conduct we must provide a reasonable and appropriate general explanation of the nature and material terms of the relevant contract or transaction to a client, and generally make full and frank disclosure of any information that would reasonably be expected to enable the client to make an informed decision. An investment proposal, followed by a record of advice ensures that we comply with the code.
- e. RWG remains at the disposal of its clients as and when they need information on any and all investment products.
- f. RWG meets with product providers and fund managers on an ongoing basis to make sure that the products/investment options we offer to our clients remains up to date and current.

Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

- a. In terms of Section 8 of the FAIS General Code of Conduct we must do a suitability analysis prior to providing a client with advice. All clients undergo a needs analysis and risk assessment at the inception of our relationship and this is updated as often as necessary in order to render accurate and suitable advice.
- b. Every client is furnished with a record of advice subsequent to meeting with them, this record of advice follows all of the principles outlined by FAIS.
- c. All of RWG's advisors have written the necessary regulatory exams which allow them to provide financial advice across various products. In addition, all advisors are constantly meeting with fund managers and product providers to stay up to date.

Outcome 5: Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.

- a. Funds are monitored and track records evaluated before recommending them to clients. Should funds perform out of line with expectations their suitability is reassessed and, if necessary, clients are disinvested from them.
- b. Wherever possible we give feedback to investment managers and institutions about their products and funds in order to encourage better investment products for our clients and the industry at large.
- c. Funds are selected based on numerous quantitative and qualitative factors and centre on the needs of a client and his/her investment requirements.
- d. Investments are reviewed on a continuous basis and the rationale for fund selection is assessed on a periodic basis together with our outsourced investment manager.

- e. A variety of factors, including the economic climate, are discussed at review meetings with clients, providing them with a point of reference when assessing investment performance over a period.
- f. In relation to an error on a client's portfolio, once the error has been detected, a calculation is performed to assess if the client is any worse off as a result of an error. If this is the case, the client is put back in the position they should have been in. These errors are communicated appropriately with the client.
- g. Any profits resulting from an error are for the clients benefit.

Outcome 6: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

- a. RWG maintains open channels of communications that all client queries are resolved timeously and to the satisfaction of the client.
 - b. Clients can lodge a complaint/query at any point directly to any individual at RWG.
 - c. Should clients be uncomfortable with products/funds in which they are invested, bar any regulatory reasons, changes can be made at the clients request with relative ease.
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