

TREATING CUSTOMERS FAIRLY (TCF) POLICY

1. INTRODUCTION

The Treating Customers Fairly (TCF) initiative, introduced by the Financial Sector Conduct Authority (FSCA), is a cornerstone of market conduct regulation in South Africa. The objective of this policy is to ensure that Janine Linde Makelaars (Pty) Ltd, as a Financial Services Provider (FSP), consistently delivers fair outcomes to customers and takes responsibility for the fair treatment of customers throughout the product life cycle.

This TCF Policy serves as a guideline for implementing the six TCF outcomes and ensuring that fair treatment is central to our business culture, operations, and client interactions.

2. PURPOSE

The purpose of this Treating Customers Fairly Policy is to:

- Ensure that the fair treatment of customers is embedded into the culture of Janine Linde Makelaars (PTY) Ltd and its representatives.
- Provide a framework for applying TCF principles across all business areas.
- Demonstrate commitment to fair customer outcomes in line with regulatory expectations.
- Promote transparency, trust, and ethical conduct in all dealings with clients.
- Support continuous improvement through monitoring, reporting, and corrective actions where required.

3. OBJECTIVES

This policy aims to:

- Align business processes and conduct with the six TCF outcomes.
- Empower employees to make fair, transparent, and ethical decisions in all customer engagements.
- Minimise the risk of customer detriment or unfair treatment.
- Strengthen relationships with clients, suppliers, and stakeholders through trust and integrity.

- Meet and exceed the compliance obligations of the FAIS Act and other applicable legislation.

4. SCOPE

This policy applies to:

- All Janine Linde Makelaars (PTY) Ltd staff, representatives, and contracted intermediaries.
- All business areas, including product design, marketing, advice, administration, claims handling, and complaints resolution.
- All client interactions, whether written, telephonic, electronic, or face-to-face.

5. TCF PRINCIPLES AND OUTCOMES

Janine Linde Makelaars (PTY) Ltd adopts the six TCF outcomes as defined by the FSCA and ensures that these outcomes are implemented at every stage of the product and client lifecycle.

Outcome 1: Culture and Governance

Customers can be confident that they are dealing with an FSP where the fair treatment of customers is central to the culture.

Janine Linde Makelaars (PTY) Ltd will:

- Embed TCF in its mission, vision, and values.
- Ensure senior management and Key Individuals take responsibility for embedding TCF in all business activities.
- Include TCF awareness in staff induction, training, and performance management.

Outcome 2: Product and Service Design

Products and services are designed to meet the needs of identified customer groups and are targeted accordingly.

Janine Linde Makelaars (PTY) Ltd will:

- Review product design and appropriateness before distribution.
- Conduct due diligence on product suppliers to ensure suitability.
- Document product approval processes, including risk assessments and client suitability.

Outcome 3: Clear Information and Communication

Customers receive clear, relevant, and timely information before, during, and after contracting.

Janine Linde Makelaars (PTY) Ltd will:

- Provide all communications in plain, understandable language.
- Ensure that marketing materials are accurate and not misleading.
- Keep customers informed of any product changes, fees, or risks.

Outcome 4: Suitable Advice

Advice provided to customers is suitable, considering their circumstances.

Janine Linde Makelaars (PTY) Ltd will:

- Conduct comprehensive needs analyses before providing advice.
- Ensure all recommendations are appropriate and recorded.
- Maintain advice documentation and provide clients with written records of recommendations.

Outcome 5: Product Performance and Expectations

Products perform as the FSP has led customers to expect, and the service is of an acceptable standard.

Janine Linde Makelaars (PTY) Ltd will:

- Monitor products and services for consistent performance.
- Review and address customer feedback and complaints to improve delivery.
- Ensure post-sale service aligns with the original product disclosures.

Outcome 6: No Unreasonable Barriers

Customers do not face unreasonable post-sale barriers to change a product, switch providers, submit a claim, or lodge a complaint.

Janine Linde Makelaars (PTY) Ltd will:

- Maintain transparent and efficient processes for claims, switching, and cancellations.
- Ensure prompt complaint acknowledgment, fair resolution, and timely feedback.
- Regularly review procedures to remove unnecessary administrative obstacles.

6. IMPLEMENTATION FRAMEWORK

The implementation of this TCF Policy involves the following key areas:

6.1 Governance and Oversight

The Board of Directors and Key Individuals are accountable for embedding TCF principles across the business. TCF performance will be reviewed regularly at management meetings.

6.2 Training and Awareness

All staff will undergo regular training on TCF principles, ethical behaviour, and customer service excellence.

6.3 Product Approval Process

Each new product or service will undergo a documented approval process to ensure compliance with TCF outcomes.

6.4 Advice and Sales Process

Representatives must comply with FAIS and TCF principles when providing advice, ensuring suitability and disclosure.

6.5 Complaints Management

All complaints will be managed according to Janine Linde Makelaars (PTY) Ltd Complaints Management Framework, ensuring fair, timely, and consistent outcomes.

6.6 Record Keeping

Accurate and complete client records will be maintained to demonstrate adherence to TCF principles.

6.7 Monitoring and Reporting

Regular audits and monitoring will be conducted to assess compliance with TCF. Non-compliance will be corrected through training and remedial action.

7. MONITORING AND REVIEW

Janine Linde Makelaars (PTY) Ltd will maintain measurable TCF indicators, such as:

- Client satisfaction levels.
- Complaint volumes and resolution times.
- Audit results and compliance reports.
- Staff competency and ethical performance.

The TCF Policy will be reviewed **annually** or when regulatory or business changes occur. Any amendments will be approved by senior management.

8. ROLES AND RESPONSIBILITIES

Board of Directors / Key Individuals:

Provide strategic oversight, approve the TCF Policy, and monitor compliance.

Compliance Officer:

Ensure ongoing monitoring, training, and regulatory compliance.

Management and Supervisors:

Implement TCF principles in business processes and supervise representatives.

Representatives and Staff:

Apply TCF in daily interactions, client advice, and communication.

9. DOCUMENTATION AND RECORDS

Janine Linde Makelaars (PTY) Ltd will maintain comprehensive documentation to demonstrate compliance, including:

- TCF Policy and Framework.
- Training records.
- Client communication logs.
- Complaint and feedback reports.
- Internal audit and monitoring outcomes.

10. CLIENT COMMUNICATION

Janine Linde Makelaars (PTY) Ltd commits to open, transparent, and proactive communication with clients. All communications will:

- Be clear, concise, and relevant.
- Explain risks, costs, and implications clearly.
- Include escalation channels for unresolved issues.

11. CONTINUOUS IMPROVEMENT

Janine Linde Makelaars (PTY) Ltd recognises that treating customers fairly is an ongoing commitment. Feedback from clients, staff, and the regulator will be used to:

- Identify process improvements.
- Enhance service delivery.
- Promote a culture of fairness, respect, and accountability.