

HGG

welvaart

wealth

TREATING CLIENTS FAIRLY POLICY

This policy is owned by HGG Wealth (Pty) Ltd
a duly authorised Financial Services Provider.

The processes contained herein forms part of the FSP's internal control structures and procedures.

As the Key Individual of the aforementioned FSP, I Graham Wilkins
hereby confirm the adoption of the processes set out in this document.


Key Individual Signature

31/1/2017
Date


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1) DOCUMENT REVIEW ROSTER

The Treating Customers Fairly Policy is a working document that must be reviewed periodically.

It is advisable to review the policy on an annual basis. Any amendments must be indicated on the document review roster and relevant staff members must be informed of any updates.

Review Date	24 January 2017
Comments / Amendments	Finalised policy and compiled document
Next Review Date	17/2/2017
Responsible Person Signature	

Review Date	17/2/2017
Comments / Amendments	No request for changes received after review by all.
Next Review Date	22/3/2017
Responsible Person Signature	

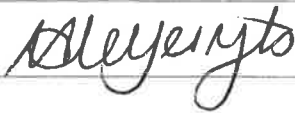
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Comments / Amendments	
Next Review Date	
Responsible Person Signature	

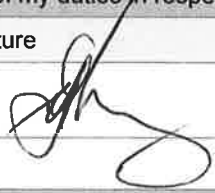
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Responsible Person Signature	


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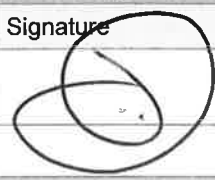
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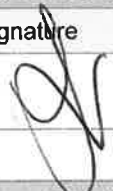
2) STAFF CONFIRMATION SHEET


I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Hendrik Gerrys	17/2/2017	


I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Niek van den Berg	31/1/2017	

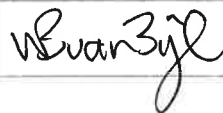
I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Leras Uys	17/2/2017	

I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
David Walker	17/2/2017	

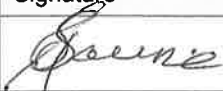
I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Greta Walker	17/2/2017	

I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Dennis Robertson	17/2/2017	

I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Stefanie Tolken	09/02/2017	

I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Nanda van Zijl	31/1/2017	

I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Leonie Geldenhuys		

I confirm that I have read and understand the contents of this document and that I am aware of my duties in respect thereof		
Name	Date	Signature
Jackie Fourie	08/02/2017	

3) TCF CHAMPION

The FSP has appointed a TCF Champion as part of its commitment to treat its clients fairly. The appointment of the TCF Champion is confirmed in Annexure C hereto.

The TCF Champion is actively involved with embedding TCF principles into the organisation and instilling a culture where the fair treatment of clients is embraced and adopted. The TCF Champion will assist the governing body of the organisation to implement and adopt business processes aimed at ensuring that the organisation is at all times achieving the outcomes of TCF.

The TCF Champion has the authority to approach and speak to staff members at all levels about the delivery and achievement of TCF outcomes.

The TCF Champion need not have any specific qualifications but must have a thorough knowledge of the organisation's functional departments, business processes and the principles associated with treating clients fairly.

4) THE SIX TCF OUTCOMES

The FSP respects the Regulator's mission to maintain a sound financial investment environment in South Africa and acknowledge its mandate to promote the:

- fair treatment of consumers of financial services and products
- financial soundness of financial institutions
- systematic stability of financial industries
- integrity of financial markets and institutions

To this end the FSP welcomes the TCF initiative and commits itself to align the FSP's organisational culture and business processes in such a way as to ensure that the six outcomes of TCF are at all times achieved.

5) OUTCOME 1

Clients are confident that they are dealing with firms where the fair treatment of clients is central to the firm culture.

POLICY STATEMENT

It is our committed objective to ensure that all our clients or potential clients can be confident that they are dealing with an FSP where the fair treatment of clients is central to the corporate culture.

We use our best efforts to ensure that at all times we, our staff members and representatives 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.

Delivery of the TCF outcomes is a core feature of the FSP's stated values, code of conduct and ethics policy.

PROCEDURES IMPLEMENTED IN ORDER TO ACHIEVE POLICY OBJECTIVES

LEADERSHIP

- TCF is a standing item on the governing body of the FSP's meeting agenda where the FSP's approach to TCF is analysed and discussed.
- Senior management has adopted TCF deliverables and have been allocated specific responsibilities in terms thereof. Senior management in all areas of the FSP that contribute to the rendering of financial services to clients (whether directly or indirectly), understand their respective roles in delivering TCF outcomes to those clients.
- Senior management conducts regular reviews of the main business processes with a view to identifying areas that do, or may, require improved TCF deliverables. Explicit allowance has been made to allow for and consider TCF implications and deliverables during the strategic planning process of any new strategy or change in existing strategy.
- Adherence to the TCF deliverables is monitored as part of our Compliance Monitoring Programme. We ensure on a monthly/ quarterly/ bi-annual basis that accurate, meaningful and timely Management Information has been produced during the period and that senior management acts accordingly. Existing tests within our Compliance Monitoring Programme aid us in demonstrating our level of compliance and adherence to the TCF outcomes. Where there are TCF action points, these will be documented and carried over to a further (minuted) meeting.

DECISION MAKING

- All requests by the FSP's governing body for the approval of product and service innovations or project expenditure include due consideration of the possible impact it may have on TCF outcomes.
- The organisation has established accessible forums or structures through which staff members and management are able to debate TCF related matters and refer any TCF questions or concerns.

GOVERNANCE AND CONTROLS

- Oversight and monitoring of TCF delivery has been explicitly assigned to the governance and control structures of the organisation tasked with risk management and the compliance function.
- Procedures have been implemented to ensure formal and regular reporting to the governing body and senior management on the progress in achieving TCF deliverables across all of the organisation's activities.
- The management of TCF and market conduct risks are formally included in the risk management framework of the organisation and are regularly monitored and supervised by the Compliance Officer.

- There is ongoing evaluation of whether the organisation's governance framework as a whole has been effective in achieving TCF outcomes.
- We have mechanisms in place to monitor and respond to changes in the broader environment such as economic and regulatory developments to enable us to proactively identify TCF related risks.

EMPLOYEE PARTICIPATION

- All staff members (including senior management) whose roles require delivery of TCF outcomes have been identified.
- Staff members undergo training on TCF principles and deliverables.
- All staff members are aware of the requirement to treat clients fairly. This Policy has been circulated to all staff members and staff members are encouraged to make suggestions to our TCF Champion on how the treatment of our clients might be further enhanced.

MANAGEMENT INFORMATION (MI)

- Existing MI measures have been reviewed to determine which are useful for TCF monitoring and new measures have been identified where necessary (See Annexure B).
- We analyse and act on MI findings to identify staff training needs and to align performance management measures.

6) OUTCOME 2

Products and services marketed and sold in the retail market are designed to meet the needs of identified client groups and are targeted accordingly.

We provide advice and certain intermediary services on products that fall within the categories and sub-categories of the financial products listed in Annexure A.

Our clients can typically be grouped into three broad categories:

- Low sophistication: Relatively inexperienced groups with a high level of dependence
- Moderate sophistication: General client groups falling into the mass market
- High sophistication: Investment groups who have expertise

Our product approval and product selection processes includes senior management confirmation that a product adequately meets the outcomes of TCF and that any such product will perform as clients are led to expect.

Our product approval and product selection processes also include the careful consideration of the elements listed below:

- When selecting a product to distribute or to administer, we identify the particular client groups for which the product can be considered suitable.
- We obtain information from the product supplier regarding client groups in respect of which the product is regarded as most suitable.

- We provide our staff members and representatives with information and guidance to determine the client group/s in respect of whom the products are best suited.
- In determining whether our distribution and administration methods are suitable for the product and target market, we take into account all known and foreseeable risks associated with the product.
- We have measures in place to identify and mitigate risks that a product or service may pose to particular client groups.
- When approving or selecting any product for distribution:
 - we assess the suitability of any promotional or other material that has been designed for the identified client group
 - we assess the suitability of any related and optional (bundled and "add-on") products or services for the identified client group
- Moreover, should any product be selected that includes bundled or "add-on" products or services, we confirm that there are processes in place to ensure the fair treatment of clients or members with regard to such bundled and "add-on" products or services, including ensuring that these products or services are appropriately targeted to the needs of client groups for which they are provided.
- We have processes in place to mitigate risks where it becomes apparent that the product or the distribution or the administration method, or any combination of these elements, was not suitable for the identified client group, or that the product has been distributed to inappropriate client target groups.

7) OUTCOME 3

Clients are provided with clear information and are kept appropriately informed before, during and after the point of sale.

- We assess the clarity, appropriateness and fairness of product information provided to clients, whether such information is produced by ourselves or by others and all product related information requires sign-off by senior management.
- Before any product information is issued, it is carefully tested to ensure that the content will be clear and understandable by the target audience and client group.
- We have implemented appropriate procedures to ensure that any information we provide regarding any other party's products or services is accurate, clear, and fair and is not misleading.
- We regularly review standardised product information we use (whether produced by the FSP or not) to ensure that it remains accurate, clear and appropriate to the applicable client groups.
- We monitor and act on feedback, complaints and suggestions received from clients, staff members or any other parties that communicate the need for improvement in product information.
- We provide all existing clients with written statements at least once a year that identify any financial products that have been acquired by that client and where such products are still in existence. Such statements provide brief current details (where applicable), of:
 - any ongoing monetary obligations of the client in respect of such products;
 - the main benefits provided by the products;
 - where any product was marketed or positioned as an investment or as having an investment component, the value of the investment and the amount of such value which is accessible to the client; and
 - any ongoing incentives, consideration, commission, fee or brokerage payable to ourselves in respect of such products.

- A documented Record of Advice as provided for in section 9 of the General Code of Conduct (Board Notice 80 of 2003 as amended) is maintained for each and every transaction entered into with any client and a copy of the applicable record of advice is handed to each client upon completion of the transaction.
- We ensure that clients are informed of any recent or pending changes to our products, contractual events or any actions required from them, and that such information is provided in sufficient time to enable any client to reasonably respond to or act on that information.
- To the extent applicable, we control the accuracy and quality of any once-off or non-standard product information provided by staff members or representatives to clients or potential clients.
- We maintain up-to-date contact details of all our existing clients.
- We ensure that clients have current and accessible contact points if they need product or service information or need to get in contact with us for any reason.
- We have accurate, retrievable, secure records of all product information we have provided to clients and any other material interactions with clients.

8) OUTCOME 4

Where clients receive advice, the advice is suitable and takes account of their circumstances

- Prior to contracting with any product supplier to market their products, we conduct an appropriate level of due diligence to satisfy ourselves that their products and service levels are likely to meet our clients' reasonable expectations.
- We insist that product suppliers provide our representatives with adequate training on the specific products we market to enable them to render suitable financial services on those products.
- We have controls in place to prevent our representatives from rendering any financial services to any client in respect of products for which adequate product training has not been provided.
- Prior to contracting with any product supplier to market their products, we make appropriate arrangements to ensure that the FSP and our representatives will have reasonable access to any product information required from the product supplier to enable all parties to render suitable and appropriate financial services to clients and potential clients.
- We have implemented procedures that ensure that all representatives, prior to providing advice to a client:
 - take reasonable steps to seek from the client appropriate and available information regarding the client's financial situation, financial product experience and objectives to enable the provider to provide the client with appropriate advice;
 - conduct an analysis, for purposes of the advice, based on the information obtained;
 - identify the financial product or products that will be appropriate to the client's risk profile and financial needs, subject to the limitations imposed on the provider under the FAIS Act or any contractual arrangement;
 - take reasonable steps to establish whether the financial product identified is wholly or partially a replacement for an existing financial product of the client and if it is such a replacement, follows all the required disclosure procedures; and
 - take reasonable steps to ensure that the client understands the advice and that the client is in a position to make an informed decision.

- In order to ensure that the highest level of financial services are rendered to our clients and potential clients, we identify any risk of inappropriate financial service and we monitor feedback or complaints received from clients, product suppliers or other third parties regarding the quality of financial service they may have received from our representatives.
- We have implemented procedures to identify instances where our representatives have provided inappropriate advice or misleading information to clients and have implemented further procedures that seek to mitigate the risk to clients should such events occur.
- We monitor potential TCF indicators such as insurance claims experience, product retention / early termination data, investment portfolio switching, type and frequency of product changes in relation to the clients associated with our representatives, in order to identify and mitigate risks of any inappropriate financial services or poor client outcomes attributable to the representatives concerned.
- We provide product suppliers and other third parties in the client value chain with feedback in relation to any aspects of their products or services which inhibit our ability to provide suitable advice or the delivery of other TCF outcomes to clients.
- We have controls in place to identify and address any conflicts of interest between ourselves, our clients and product suppliers whose products we market.
- There are clear agreements between ourselves and any product suppliers whose products we market that set out our respective responsibilities in relation to providing clients with appropriate financial services, information and service support. These agreements are structured to ensure that clients understand who they should look to in relation to different aspects of the financial products or service provided to them.
- We have controls in place to identify and act on instances where our representatives have provided advice which they are not authorised to provide, either in terms of their specific contract or mandate with us and/or with any product supplier, or as a result of non-compliance with our FAIS licence conditions or other legal requirements.
- We monitor the published decisions of the FAIS Ombud, communications from the Regulator and any other relevant information sources in relation to advice practices, to ensure that our controls and practices in relation to this TCF outcome remain relevant and effective.

9) OUTCOME 5

Clients are provided with products that perform as the firm has led them to expect, and the associated service is of an acceptable standard and as they have been led to expect

- Processes are in place to mitigate the risk that products and services are unable to satisfy the reasonable expectations of clients.
- Processes are in place to alert clients to the risks resultant from their actions (such as early termination of a product, non-payment of contributions, investment portfolio switches, and benefit reductions) in reasonable time for them to respond to or act on the information.
- Processes are in place to alert clients to the risks of non-action on their part, such as a failure to review insurance cover needs, investment goals, risk profiles and beneficiary nominations.
- We monitor and act on feedback, complaints and suggestions received from clients, intermediaries and staff members that identify the need for improvements in our services or service standards.
- Where it becomes apparent that products are not performing or are unlikely to perform as clients have been led to expect, we have implemented processes to mitigate the risks to our clients.
- We have adopted "Management Information" on client expectations (See Annexure B).

- Processes are in place to protect the confidentiality of all client information.

The procedures listed below are for third parties such as product suppliers, Category II, IIA or III FSPs, binder holders, reinsurers, administrators and other outsourced service providers that are part of the overall value chain in providing products or services to our clients. These procedures do not apply to the relationship between product suppliers and Category I FSPs.

- We have clear agreements in place regarding the division of responsibilities between the various parties to ensure the fair treatment of clients.
- We conduct an appropriate level of due diligence on any such third party, before dealing with them, to satisfy ourselves that TCF outcomes are adhered to and that the products and / or service levels, as the case may be, are likely to be as clients (and we) have been led to expect.
- We regularly monitor the third party's client treatment standards, including how the third party meets client expectations.
- Processes are in place to mitigate the risks to our clients where it becomes apparent that a third party's products are not in fact performing as clients (and we) have been led to expect by that third party or where it becomes apparent that service from the third party is not of an acceptable or agreed upon standard.

10) OUTCOME 6

Clients do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint

CHANGING PRODUCTS

- We inform our clients (in good time, not only on request) of the types of permissible changes they may make to their products if their individual needs or circumstances change and of any important limitations on their ability to access funds or to make amendments to any product.
- When we become aware of any changes to a client's needs or circumstances (including affordability difficulties), we inform such client of possible product changes that are available to them in order to meet their changed requirements.
- Where a request for a product change is declined by any party in the value chain, we provide the client with clear reasons for the decision.
- When we receive a request to change a product (whether directly or through another party) we inform the client of any potential risks associated with the change, in reasonable time for them to respond to or act on the information.

SWITCHING PROVIDERS

- We have clear service standards in place for processing switches to other providers and communicate these to our clients.
- When we receive a request to switch providers (whether directly or through another party) we inform the client of any potential risks associated with the switch.

CLAIMS AND DISBURSEMENT HANDLING (BINDER HOLDERS: LONG-TERM AND SHORT-TERM INSURANCE ONLY)

- We test our claims and/or disbursement handling processes to ensure that it is suitable for the product and target client group concerned.

- We inform our clients (not only on request or at claim stage) of the process that must be followed in order to submit a claim or a disbursement request and what information will be required in order to process a claim or a disbursement request.
- We inform our clients of our service standards when processing claims and disbursement requests.
- We inform clients prior to contracting, of the circumstances under which claims or disbursement requests will not be processed and explain the client's obligations in this regard.
- Once a claim has been received, we keep clients/members informed of our progress.
- Where a claim is repudiated, wholly or partially, or a disbursement request is declined, we provide the client/member clear reasons for the decision, with supporting evidence, where relevant, and the steps available to the client in order to review the decision (if any).
- We consider the claims repudiation experience and quality of claims handling of different insurers when recommending an insurer to clients.

COMPLAINTS HANDLING

- We test our complaints process to ensure it is accessible and appropriate to our client group/s.
- We have a complaints management, record keeping and root cause analysis process.
- We inform clients (before complaint stage) of the process that must be followed in order to submit a complaint and of the various options available for further recourse if the client is dissatisfied with the outcome of the complaint.
- Once a complaint has been received, whether we are dealing with the complaint ourselves or where we have referred the complaint to another party, we keep clients informed of its progress (including the contact details of the person responsible for processing the complaint)
- When responding to a complaint, we provide clear reasons for our response (including where the response is favourable to the client), with supporting evidence where relevant.
- Where a request for redress is declined, wholly or partially, we inform the client of the steps that may be followed in order to have the decision reviewed.
- Complaints processes are structured in such a way as to ensure that there are no conflicts of interest and that all decisions are based on objective facts and criteria.
- Complaints processes are structured in such a way as to ensure that complaints of a similar nature have a similar outcome.
- Follow-up processes are in place to determine the client satisfaction levels of complaints that have been finalised.
- We analyse complaints to identify any risks of mis-selling (whether by our own representatives or not).

ANNEXURE A : AUTHORISED FINANCIAL PRODUCT CATEGORIES AND SUBCATEGORIES

Category Advisory FSP	Advice	Intermediary Services
1.1 Long-term Insurance: Subcategory A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.2 Short-term Insurance: Personal Lines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.3 Long-term Insurance: Subcategory B1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.4 Long-term Insurance: Subcategory C	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.5 Retail Pension Benefits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.6 Short-term Insurance: Commercial Lines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.7 Pension Fund Benefits (excluding retail pension benefits)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.14 Participatory Interests in one or more Collective Investment Schemes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.16 Health Service Benefits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.18 Deposits as defined in the Banks Act – 12 months or less	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
1.20 Long-term Insurance: Subcategory B2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

ANNEXURE B : MANAGEMENT INFORMATION**DATA SET : SALES**

(Outcomes 2, 3, 4 & 5)

Data Measured	Possible TCF Implications
Sales volume by product type	Product suitability – excessive sales of one product may indicate mis-selling or unsuitable sales including inadequate suitability analysis
Sales volume by commission rate / type	Commission rate payable on a particular product may result in product bias, leading to mis-selling or unsuitable sales. As above, this may mean suitability was not properly assessed
Cancellation within cooling off period	High cancellation rates may indicate unsuitable advice and/or a misunderstanding of the product on the part of the client
Early cancellation rates	Excessive early cancellations may indicate a lack of suitability of advice as the client believes the product is unsuitable or is unable to afford premiums and terminates early
Percentage of file check fails – total and by representative (based on a sample of files)	By FSP / Representative - evidence of systemic weaknesses and/or breaches of the General Code of Conduct (particularly disclosure) which may result in misleading or insufficient information being given and/or mis-selling. By representative – may indicate training needs
Percentage of representatives completing new product training within a given period	Training and competency of representatives is a key component in ensuring that clients are treated fairly. Poor product knowledge may lead to inappropriate recommendations

DATA SET : COMPLAINTS

(Outcomes 1, 2, 3, 4, 5 & 6)

Data Measured	Possible TCF Implications
Volume of complaints	May indicate mis-selling or other failings affecting the fair treatment of clients
Complaints against any particular representative	As above, may reveal a training need
Complaints against a particular product	May indicate product and/or provider's marketing material is unclear or misleading or unsuitable for the target market. This could lead to mis-selling or other unfair treatment of clients
Complaints relating to information supplied by representatives	Could indicate either a lack of clarity and completeness of essential features and other information that was supplied by the representative, (or in the actual financial services that were rendered) and/or deficiencies in the product information provided by the product provider to the representative
Complaints upheld internally – analysed by reference to whether there was negligence, failure to comply with statutory requirements of unfair treatment	May reveal trends depending on the underlying reasons and the need for improvements in the relevant areas. May be a measure of the fairness of the complaints handling procedures
Volume and percentage of complaints referred to FAIS Ombud	May identify possible areas of misunderstanding by clients as to what constitutes a complaint (assess possible action to reduce this). May indicate unfairness in the complaints handling process
Percentage of complaints to FAIS Ombud upheld	External measure of complaints handling process
Percentage of complaints to FAIS Ombud not upheld	May be indicative that the FSP's complaints handling process is fair and resulting in the right outcomes

Percentage of complaints acknowledged within the time frame stipulated in the official Complaints Policy of the FSP	Performance measurement of timeliness of complaints handling process
Percentage of complaints resolved within the time frame stipulated in the official Complaints Policy of the FSP	Performance measurement of complaints being handled in a fair and timely manner
Number of recommendations following complaint raised	Action being taken to improve standards. Could be evidence of a TCF culture and embedding
Number of recommendations following complaint that resulted in a change to procedure or policy	Action taken to improve standards/reduce complaints. Could be evidence of a TCF culture and embedding

DATA SET : AFTERS SALES SERVICE	(Outcomes 1, 2, 3, 4 & 6)
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Data Measured	Possible TCF Implications
Percentage of clients contacted within 12 months of completion and reason for contact	May be a measure of the standard of client care, depending on the reason for the contact
Percentage of clients contacted following completion of satisfaction survey	Fairness related questions (e.g. 'what does this product do'?'/ 'why did you buy it'?) and questions relating to whether the client understood what type of service they received may indicate whether the client has been treated fairly
Overall service satisfaction score for this period out of 10	May indicate whether clients are being fairly treated, depending on the questions asked

DATA SET : CULTURE AND VALUES	(Outcomes 1)
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Data Measured	Possible TCF Implications
Percentage of staff who have completed general TCF training – sales and non-sales	May be indicative of TCF awareness and a TCF culture and communication strategy
Documented TCF Policy and strategy	Senior management/business owner commitment and strategy

DATA SET : FEEDBACK TO PRODUCT SUPPLIERS	(Outcomes 1 & 5)
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Data Measured	Possible TCF Implications
Number of cases of product feedback / suggestions to providers to assist TCF	Feedback on the quality / suitability of a product and/or clarity of product information may improve consumer outcomes

DATA SET : STRATEGY	(Outcomes 1)
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Data Measured	Possible TCF Implications
The FSP has a strategic commitment (documented) to avert major TCF risks / failings through ongoing scrutiny of sales targeting of products	FSP's commitment to prevent major TCF failings – such as endowment mis-selling.

ANNEXURE C : TCF CHAMPION APPOINTMENT

The FSP has appointed a TCF Champion as part of its commitment to treat its clients fairly.

The TCF Champion is actively involved with embedding TCF principles into the organisation and instilling a culture where the fair treatment of clients is embraced and adopted. The TCF Champion will assist the governing body of the organisation to implement and adopt business processes aimed at ensuring that the organisation is at all times achieving the outcomes of TCF.

The TCF Champion has the authority to approach and speak to staff members at all levels about the delivery and achievement of TCF outcomes.

The TCF Champion need not have any specific qualifications but must have a thorough knowledge of the organisation's functional departments, business processes and the principles associated with treating clients fairly.

Specific duties include:

- Manage adherence to TCF policy and sign-off by all staff.
- Ensure client documents relating to compliance and advice record keeping procedures are up to date.
- Ensure brokers receive on-going product training.
- Ensure regular contact is kept with Broker Consultants in order to be kept up to date on new product developments and any process changes.

As Key Individual of the FSP, I Graham Wilkins
hereby appoint

Niek van den Berg
as the FSP's Treating Clients Fairly Champion.

Key Individual Signature

Date

31/1/2017

TCF Champion Signature

Date

31/1/2017

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.

- Do you understand your clients, their financial situation and their financial needs? Y N
- Do you understand what the products really do, and how it matches the needs of your clients? Y N Rating:
- Do you do a due diligence on all the products / providers you offer? Y N Rating:
- Do you do a suitability analysis in terms of Section 8 of the General Code of Conduct? Y N Rating:

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

- Do you use clear explanations of the products when talking to your clients? Y N
- Do you keep your customers informed of the processes and information required by the product suppliers? Y N
- Do you guide clients about the information required by product suppliers? Y N
- How do you disclose information in terms of Section 7 of the General Code of Conduct? Provide Disclosure letter at contact stage to client.

FSP name: HGGF Wealth (Pty) Ltd
 Key Individual signature: 

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

- Have you thought about TCF and how you treat your clients? Y N
- If you are your own client, would you be happy with the way you are treated? Y N Rating:
- Do you and your staff talk about the treatment of clients, and do you have a unified approach? Y N
- Do you do a due diligence on other businesses before contracting with them? Y N

TREATING CUSTOMERS FAIRLY

Sec 2 of the FAIS General Code of Conduct already obliges FSP's to *"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."*

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

- For what percentage of your clients do you conduct a suitability analysis in terms of Section 8 of the General Code of Conduct?
- Do you check your client's needs against the recommendations? Y N Rating:
- Does your record of advice comply with the General Code of Conduct and does it contain all the required disclosures? Y N Rating:
- Do you consider all requirements relating to replacement of products? Y N

Please complete the following 1-10 questionnaire by answering YES or NO under each question in all six Outcomes and give yourself a rating (where applicable) out of 10, 10 being the highest.

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

- When you provide after-sales services, is it easy for clients to contact you for assistance? Y N
- Do you make it a priority to assist clients who have complaints? Y N
- Do you help clients when they contact product suppliers for any service after contracting? Y N

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.

- Do you check product performance before you recommend it to your clients? Y N
- Is the service provided by product suppliers to clients after contracting stage satisfactory? Y N Rating:
- Do you give feedback to product suppliers about their products and services? Y N