



Treating Customers Fairly (TCF) Policy

1) Introduction

The Treating Customers Fairly (TCF) initiative is an outcomes-based regulatory and supervisory framework set out by the Financial Sector Conduct Authority (FSCA). It is designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms. Fair treatment of customers underpins the General Code of Conduct for financial services providers (FSPs) and Representatives.

Trive South Africa (Pty) Ltd incorporates TCF with oversight from Trive's Board of Directors, South Africa management teams and compliance department.

2) Scope

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

Leadership and Governance:

The Directors and management of Trive South Africa (Pty) Ltd provide direction and monitor the delivery of TCF behaviours and outcomes.

Decision-making & Strategy:

Decision-making rules ensure that all decisions that impact on customers are subject to the best interest of our clients and in line with our TCF strategy.

Performance management:

Trive's staff and FAIS Representatives are trained to deliver appropriate TCF outcomes. TCF deliverables form part of our staff performance metrics 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.

3) Treating Customers Fairly Fairness Outcomes

We have incorporated the FSCA's 6 TCF outcomes into our business operations:

Outcome 1: Culture and Governance

- I. Customers are confident that they are dealing with a firm where the fair treatment of customers is central to the firm culture.
- II. 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.



- III. We have ensured a high level of staff awareness and ongoing training of TCF.
- IV. Our conflict-of-interest policy always upholds the best interest of our clients.

Outcome 2: Products and Services Marketed and Sold

- I. We extensively consider the profile of the end client when designing products.
- II. We keep ongoing and sufficient details about our clients in order to service and marketing them adequately.
- III. We have a detailed policy on Direct Marketing within the guidelines of the FSCA.

Outcome 3: Clear Communication

- I. 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.
- II. We use clear explanations of the products when talking to our clients, disclosed to the client in plain language.
- III. 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. When and where necessary, we host product presentations for our clients detailing all the necessary product information, advantages and disadvantages
- IV. We consider the end client when we develop marketing and product disclosure material - reference can be made to our fund fact sheets and website (www.trive.com/za).
- V. Should we discover misrepresentation of our products/services, a full review and due diligence process would again be undertaken by senior management and compliance department.
- VI. We are highly accessible to clients who may need information on our products and services through our FAIS Regulated Representatives.
- VII. We have controls in place to ensure our product/service information remains current:
 - Articles are compiled and distributed by qualified internal staff to keep our clients and end users updated on the latest market movements.
 - All information is updated and checked regularly on our website.

Outcome 4: Suitable Advice

- I. 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.
- II. We check the client's needs against the recommendations before any final advice is given.
- III. Our record of advice complies with the FAIS General Code of Conduct and contains all required disclosures.



- IV. All communication is conducted to clients by qualified FAIS Regulated Representatives who are overseen by the CEO, COO, Key Individual (s) and Head of Sales and Trading.
- V. We ensure that training is carried out on-going basis to all client facing staff.
- VI. Ongoing monitoring by our Compliance Department.

Outcome 5: Performance and Acceptable Standard

- I. The performance of products and service levels are according to our clients' standards
- II. We have adequate service liaison structures in place to ensure the end client receives reasonable service.
- III. Errors are dealt with at the highest leadership capacity possible.
- IV. Management and oversight of this is done by CEO, COO, Key Individual (s) and Management team.

Outcome 6: Complaints and Changes

- I. When we provide after-sales services, it is easy for clients to contact us for assistance
- II. We make it a priority to assist clients who have complaints.
- III. We have a through and details Complaints Resolution Policy & Procedure in place that is reviewed yearly by our CEO, COO, Key Individual (s) and Compliance Department.
- IV. It is very easy for an end client to engage the direct contact to lodge a complaint – a complaints policy is freely available on the website detailing the contact person and their contact details

Signed and Adopted

Name: Travis Robson

Designation: CEO & Director

Date: 30.8.2022

Signature: 