



This Document constitutes the Treating Customers Fairly (“TCF”) Policy Statement of Celagenix Financial Services (Pty) Ltd.

POLICY STATEMENT

Celagenix® Financial Services, as a licensed Financial Services Provider in terms of Section 8 of the FAIS Act, has an overarching focus on customer (‘client’) satisfaction through new ways of working. Our mission is to be respected and recognised as the leading provider of new generation, value-driven financial services and solutions, and to nurture our client relationships into longstanding partnerships through an exceptional value proposition, all-round service excellence, and a culture of belongingness, openness and transparency.

Our TCF Policy is integral to our mission, and as such, we are committed to treating our customers fairly, without exception.

Our TCF Policy is structured according to the guidance provided by the Financial Sector Conduct Authority (“FSCA”) and our external Compliance Officers, to ensure that we consistently deliver fair outcomes to our clients.



Figure 1 Regulatory Framework - The 6 TCF Outcomes

ACHIEVING THE OUTCOMES

We endeavour to demonstrate through our behaviours and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle to which we contribute. These may include:

- **Product and service design:** Products and services and their distribution strategies are designed and developed for specific target markets, based on a clear understanding of the likely needs and financial capability of each customer group.
- **Promotion and marketing:** Products are marketed to specific target groups, through clear and fair communications that are not misleading and are appropriate to the target group.
- **Advice:** Where advice is provided, advisers are fully equipped to provide advice that is suitable to the needs of the customer concerned, following the objectives of TCF and avoiding conflicts of interest.
- **Point-of-sale:** To provide clear and fair information to enable customers to make informed decisions about transacting with the FSP, our products and services. Product risks, commitments, limitations, and charges must be transparent.
- **Information after point-of-sale:** To provide customers with ongoing relevant information to enable them to monitor whether the product or service continues to meet their needs and expectations, and provide acceptable levels of service for post-sale transactions or enquiries.
- **Complaints and claims handling:** To honour representations, assurances and promises that lead to legitimate customer expectations. Legitimate expectations must not be frustrated by unreasonable post-sale barriers. There is a requirement for fair and consistent handling of claims and a mechanism to deal with complaints timeously and fairly.

EXECUTING OUR MANDATE

In order to fulfil our commitment to treating our customers fairly, we focus on the following aspects:

- Following the requirements of the FAIS General Code of Conduct and the Celagenix® Code of Ethics and Professional Conduct;
- Adhering to our Conflicts of Interest policy in dealing with customers.
- Putting management information mechanisms in place that are designed to monitor and measure the FSP's performance in delivering the relevant fairness outcomes.
- Training our staff to deal with customers professionally and maintain the highest standards of service excellence.
- Not remunerating or incentivising our staff in ways which encourage them to deal with our clients in an unfair or biased manner.
- Informing and managing customer expectations before, during, and after establishing relationships with them.
- Providing appropriate after-sales information and service to customers.
- Monitoring the performance of products, funds or solutions that we recommended to customers to assess the ongoing suitability of same for the customer.
- Ensuring open, ongoing communication with the product suppliers we deal with to maintain an appropriate level of knowledge and understanding of their products and services.
- Reviewing our TCF policy on an ad hoc basis but no less than annually.

COMPLAINTS HANDLING

We will handle complaints fairly, promptly, and impartially. In dealing with complaints, we will carefully consider whether an error might have affected a wider class of customers, and what should be done to remedy this. We will pay attention to the outcomes of complaints, which can serve as an important source of intelligence about the health of our business and systems. We will investigate the root causes of complaints and obtain feedback from customers who have experienced our complaints process to improve the level of service that we provide. We will measure the length of time taken to deal with a complaint, the outcome, and the way in which the outcome is communicated to the customer to ensure that we are treating our customers fairly.

TREATING CUSTOMERS FAIRLY IN OUR ORGANISATION

Staff

We encourage and welcome feedback from staff and customers on our services and procedures. Staff objectives include TCF as an explicit and measurable objective. Performance against this objective form part of staff competency ratings. All staff are expected to complete refresher training and testing on an ad hoc basis.

Third Parties

Before we contract with a third party, we satisfy ourselves of their commitment to treating our customers fairly. In particular, we consider their TCF policy and the management information that they can provide to demonstrate the fair treatment of our customers.

For any queries or feedback in relation to Treating Customers Fairly at Celagenix® Financial Services:

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