

TREATING CUSTOMERS FAIRLY POLICY

1. Introduction

The overriding principle central to MMCP FUND MANAGERS (PTY) LTD culture and ethos is that clients come first. MMCP FUND MANAGERS (PTY) LTD is committed to the fair treatment of all clients, irrespective of size or vehicle through which they access our investment products. MMCP FUND MANAGERS (PTY) LTD recognises that client satisfaction is the foundation on which to build an investment business which is sustainable over the long term. Delivering optimal customer outcomes is an enterprise-wide responsibility and requires participation from all parts of the business. Apart from any legislative or regulatory obligations, treating customers fairly is a business imperative. Without clients, we have no business. As an independent asset manager with no tied assets we are very conscious of the fact that assets under our management can leave us on 24 hrs notice. Hence, putting clients' needs at the forefront of what we do is a key business priority.

2. Client Charter and Values

Our client centric business model is reflected in our "Client Charter" and "Client Care Values":

Client Charter:

We strive to always put the interests of clients first;
We have an unwavering commitment to the building of long-term sustainable client relationships;
We focus on producing investment performance over meaningful periods that meets our clients' investment objectives and expectations;
We are uncompromising about applying ethics and good governance across all areas of our business.

Client Care Values:

Always put clients first
Think and act like an owner, not an employee
Always act with integrity
One business one team
Excellence in all we do
Think contribution not title
Our key drivers of our strategy as well as our day-to-day dealings with clients.

3. Treating Customers Fairly: The Financial Services Board

The Financial Services Board ("FSB") published its "Treating Customers Fairly ("TCF") Roadmap" in March 2011 as a first step towards achieving TCF fairness outcomes and culture framework requirements. The FSB requires firms to measure their activities against six TCF fairness outcomes (the "Outcomes") that aim to reduce market conduct risks and protect consumers of financial products:

Outcome 1 ("Culture"): customers are confident that they are dealing with a financial services provider where the fair treatment of customers is central to its culture;



Outcome 2 (“Products and Services”): products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly;

Outcome 3 (“Clear and Appropriate Information”): customers are given clear information and are kept appropriately informed before, during and after the time of contracting;

Outcome 4 (“Customer Advice”): where customers receive advice, the advice is suitable and takes account of their circumstances;

Outcome 5 (“Product Performance Expectations”): 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;

Outcome 6 (“Post Sale Barriers”): customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

MMCP Fund Managers (Pty) Ltd fully supports the FSB’s TCF Outcomes, to the extent relevant to our business. We have a process in place whereby we periodically evaluate ourselves against the Outcomes and we always strive to improve the way we live and/or evidence our adherence to the TCF principles, The TCF principles are a business imperative, embedded in our strategy, governance, and daily processes, as more fully described below:

- Research
- Appropriate Product
- Complete institutional offering across classes and geographies governed by clear management agreements as agreed with clients
- Clients
- Service excellence: consistent with our Client Charter and Values, which encapsulates the culture that guides our behaviour, putting clients’ needs at the forefront of what we do is a key priority.

Engagement with our clients takes place on an ongoing basis through frequent interaction at client meetings, investment report-backs and operational due diligences, as well as via quarterly reporting process. Dedicated representatives ensure that client requests for information are attended to timeously.

Within the retail business, a team of client service professionals respond to all client queries in accordance with strictly monitored turnaround times. The specialist communication needs of the professional advisor market are serviced by our representatives and regular, formalised platforms including a comprehensive round of report-back. We aim to provide excellent levels of service to all our clients, measured through ongoing client experience surveys with our representatives. The key principles of our client’s service philosophy are accessibility, accuracy, and simplicity. We have therefore set demanding client service benchmarks to ensure that our client service team remains focused on delivering on these principles.

**Client Data:**

MMCP Fund Managers (Pty) Ltd recognises that technology, although playing a vital role in enabling channels of business, also presents a risk of exposing confidential client and company data. MMCP Fund Managers (Pty) Ltd is dedicated to the protection of clients' personal information, and therefore ensures that business processes are protected by appropriate governance, controls and sufficient checks and balances. MMCP Fund Managers (Pty) Ltd uses external providers to assess its customer security framework to ensure that appropriate information security considerations, process architecture frameworks and standards are properly identified, managed, understood and embedded throughout all transactional interactions with clients.

Product Information and Communication:

MMCP Fund Managers (Pty) Ltd assesses, in aggregate, not in isolation, the cumulative impact of all client communications, for consistency of messaging and its impact on clients. To ensure consistency of messaging, all formal communication to clients goes through a rigorous review and sign-off process.

Product performance and current key information and statistics are sent to clients monthly. Specific product and regulatory changes that directly affect the product-holder are communicated directly to the holder, usually by way of email but often by physical post, as and when is appropriate or required.

Clients receive regular communication covering a range of topics, including thought-leadership articles, industry trends, market insights and business news.

Post-sale barriers:

MMCP Fund Managers (Pty) Ltd is committed to ensuring the clients do not face unreasonable post-sale barriers to changing products, switching providers, or making complaints. All product related features are disclosed during the purchase process. The only access constraints applied are those required by law, in the case of, for example, investments in individual retirement products,

Client criticism, both positive and negative, is a crucial feedback mechanism in prioritising our focus and resources. MMCP Fund Managers (Pty) Ltd has a formal "Complaints Procedures: Guidelines for Clients" that is available to clients in our office. MMCP Fund Managers (Pty) Ltd is committed to handling client complaints in a timely and fair manner and has implemented systems and procedures to satisfy this commitment. MMCP FUND MANAGERS (PTY) LTD also conducts surveys at the point of client interaction to assess the quality of the interaction. Clients are kept updated throughout the complaints process to ensure that their expectations are managed throughout.

Other examples of TCF principles evidenced in our approach to daily business:

Governance:

MMCP Fund Managers (Pty) Ltd maintains a robust corporate governance framework, effected through a senior management. The regulatory environment continues to evolve, both in South Africa and internationally.

**Staff:**

Staff enjoy an open-door policy, providing for ongoing dialogue with management on any aspect of the business.

Staff compensation is directly linked to the strength of investment performance and service delivery to clients. In line with our long-term focus, the bonus pool is also utilised to allocate investments. We rate and reward our people on their ability to add value to our clients and the business.

Developments:

The TCF framework designed by the FSB is a set of principles/norms that will find their way into law via existing legislation, regulation, and guidelines. There are many examples of the TCF Outcomes already incorporated into the existing regulatory framework, however the FSB is considering a “Conduct of Business Act” with specific “Codes of Conduct” to give further legislative effect to their stated goals.

On the basis that regulation around TCF is yet to be fully defined, this Policy will be subject to routine review as the regulatory environment becomes clearer.