



**27four Group**

# Treating customers fairly policy

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**27four**  
Group

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## 1 Introduction

The management and all who work at 27four Group (“27four”) are committed to providing the highest possible level of service in satisfying or exceeding the requirements of our clients. This level of service is achieved through quality management and by ensuring the fair treatment of all clients, irrespective of their allocation size with 27four. Clients are core to the continued success and growth of our business and delivering optimal customer outcomes are imperative to this.

Treating Customers Fairly (TCF) is an outcomes based approach designed to ensure that specific, clearly articulated fairness outcomes for financial services customers are delivered by regulated financial institutions. 27four aims to illustrate that we deliver the six outcomes to our clients throughout the product life cycle, from product design, management, reporting, servicing and complaints handling.

## 2 Scope of policy

This policy applies to the 27four Group (“27four”), which comprises the following entities:

- 27four Holdings (Pty) Ltd
- 27four Life Limited
- 27four Investment Managers (Pty) Ltd
- 27four Wealth (Pty) Ltd
- 27four Collective Investments (RF) (Pty) Ltd

## 3 Scope and application

Financial institutions measure their activities against six TCF fairness outcomes (the “Outcomes”) that aim to reduce market conduct risks and protect customers 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 financial institutions have led them to expect, and the associated service is both of an acceptable standard and aligned to 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 lay a complaint.

We regularly evaluate ourselves against the six outcomes and we always strive to improve our application of TCF principles in our product life cycle. The TCF principles form part of our culture and 27four’s staff is motivated and encouraged to apply these principals in their everyday processes and interactions.

The section below provides more details on how we view each of the six outcomes and how we apply them in our business activities.

## 4 27four’s six outcomes for treating customers fairly (TCF)

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:
  - ✓ TCF policy adopted by 27four.
  - ✓ Senior Management provides evidence of its commitment to the development and improvement of TCF principles through both words and actions. We ensure that our TCF principles are understood, implemented and maintained at the required levels of the organisation.
2. Products and Services - products and services marketed and sold in the retail market are designed to meet the needs of identified client groups and which groups are targeted accordingly:
  - ✓ products and services marketed and sold by us in the retail market are designed to meet the needs of identified client groups and distribution is focused on the targeting of those identified groups.
  - ✓ Affordable and transparent product offering.
  - ✓ Plain language product documentation which includes product details set out in terms and conditions.

- ✓ We ensure our services are delivered with clarity and transparency
  - ✓ We consistently incorporate environmental, social and governance (ESG) into our investment approach.
  - ✓ We offer a wide range of investment options with clear risk and return indicators.
  - ✓ Development of faith-based investment products (Shari'ah compliant).
3. Clear and Appropriate Information - customers are provided with concise product information, devoid of unnecessary technical jargon and concise communication processes are applied throughout the product life cycle
- ✓ Customers are provided with the following information
    - i. A Minimum Disclosure Document is made available to investors where applicable.
    - ii. The investor is provided with an application form that contains product details to ensure that the investor is appropriately informed in terms of the portfolio that they want to invest into.
    - iii. 27four generates a transaction statement confirmation in respect of each transaction for investors on a monthly basis or on request.
    - iv. 27four sends out investor statements to each investor and can send out additional statements on request.
    - v. All investors are made aware of the complaints procedure and provided with contact details, should they wish to lodge a complaint.
    - vi. All complaints are documented, lodged and managed by senior management
  - ✓ All digital content aligns to the standards and requirements defined herein (including website, social media and other means of electronic communication with investors)
  - ✓ Dedicated institutional and retail service teams ensure that all client needs are dealt with professionally and timeously.
  - ✓ We communicate with our clients in a clear and fair manner that is unambiguous and not misleading.
  - ✓ All documents are designed and structured with the end user in mind.
4. Customer Advice - where customers receive advice from the 27four entities licensed to provide financial advice, the advice is suitable and takes account of client circumstances and needs:
- ✓ We strive to ensure that where customers receive advice, that the advice is suitable and takes the customers circumstances into account.
5. Product Performance Expectations - customers are provided with products that perform as they have been led them to expect, and the associated service is of an acceptable standard;
- ✓ 27four conducts an appropriate level of due diligence on any fund manager in dealing with them, to satisfy ourselves that TCF principles are considered and that the products meet the requirement of targeted investor groups.
  - ✓ 27four has access to information held by the underlying fund manager, in relation to the investor, to ensure that information is accurately recorded, managed and stored.
  - ✓ All investment products managed by 27four have defined risk and return objectives.
6. Post Sale Barriers - customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint:
- ✓ 27four does not impose any exit penalties, surrender fee or other charges to discourage clients to withdraw from products, except where such charges are imposed by regulation and structured within specific products;
  - ✓ We aim to respond in a timely manner to our customer and prospective customer questions and queries and to address any issues or concerns promptly
  - ✓ We have a documented and implemented Complaints Policy on our website.

With reference to the complaints management process, 27four is committed to the following:

- ✓ Handling client complaints in a timely and fair manner.
- ✓ Resolving complaints in a manner which is fair to our clients, our business and our staff.
- ✓ Transparency by ensuring that clients have full knowledge of the procedures for resolution of their complaint.
- ✓ Informing clients of their rights to refer their complaints to the relevant Ombud should a complaint not be resolved to their satisfaction.
- ✓ Offering full and appropriate redress in all cases where a complaint is resolved in favour of a client.
- ✓ Adequate training of all relevant staff including imparting and ensuring full knowledge of the provisions of the legislation about the resolution of complaints.
- ✓ Maintaining a complaints register with all complaints lodged. The Compliance Officer will inspect the complaints register from time to time and monitor effective complaints resolution and compliance with the approved complaints process.
- ✓ Maintaining records of all complaints received for a minimum period of 5 years together with an indication whether or not such complaint has been resolved, cases of non-compliance with the legislation and the reasons for such non-compliance.

- ✓ Implementing procedures to:
  - a. ensure the avoidance of occurrences giving rise to complaints; and
  - b. improve services and complaint procedures where necessary.

The regulation around TCF is yet to be fully defined, and until such time that this has been done this Policy will be subject to routine review as the regulatory environment becomes clearer.

