



# TREATING CUSTOMERS FAIRLY (TCF) POLICY

**Black Broker House (Pty) Ltd**

Reg No. 2022/679476/07 | FSP No. 52891

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## 1. PURPOSE

The purpose of this Policy is to ensure that Black Broker House (Pty) Ltd ("BBH") consistently delivers fair outcomes to customers in accordance with the Treating Customers Fairly (TCF) principles of the Financial Sector Conduct Authority (FSCA).

## 2. SCOPE

This Policy applies to all directors, representatives, and employees involved in providing financial services.

## 3. REGULATORY FRAMEWORK

This Policy must be read together with:

- FAIS General Code of Conduct
- Complaints Management Policy
- Conflict of Interest Management Policy

## 4. POLICY STATEMENT

BBH is committed to maintaining a customer-focused culture where fair treatment of customers is central to all business activities.

## 5. TCF OUTCOMES AND APPLICATION

<b>Outcome 1: Fair Culture</b>	BBH ensures that fair treatment of customers is embedded in its business practices and staff conduct.
<b>Outcome 2: Suitable Products</b>	BBH offers funeral policies that are appropriate to the needs of its target market.
<b>Outcome 3: Clear Information</b>	Customers are provided with clear, appropriate, and timely information, including benefits, costs, exclusions, and waiting periods.
<b>Outcome 4: Suitable Advice</b>	Where advice is provided, it is based on the customer's needs, number of dependants, and affordability.
<b>Outcome 5: Service Standards</b>	BBH provides efficient and responsive service to customers throughout the policy lifecycle.
<b>Outcome 6: No Barriers</b>	Customers are not subjected to unreasonable barriers when submitting claims or complaints.

## 6. IMPLEMENTATION

BBH gives effect to this Policy through:

- Use of Record of Advice (ROA) where advice is provided

- Execution-only processes where no advice is given
- Standardised disclosure practices
- Clear and accessible complaints handling procedures

## 7. GOVERNANCE AND RESPONSIBILITIES

- The Director is responsible for oversight of TCF
- Representatives are responsible for applying TCF principles in all customer interactions

## 8. MONITORING AND REVIEW

BBH monitors compliance with this Policy through:

- File reviews
- Complaint analysis
- Ongoing supervision

This Policy is reviewed annually.

## 9. TRAINING POLICY

9.1 All directors, representatives, and employees are required to undergo Treating Customers Fairly (TCF) training.

9.2 TCF training must be completed:

- On induction; and
- On an ongoing basis as determined by management.

## 10. BREACH MANAGEMENT

Failure to comply with this Policy may result in disciplinary action.

## 11. APPROVAL

This Policy is approved by the Directors of Black Broker House (Pty) Ltd and is effective from the date of signature.

Signature: \_\_\_\_\_

**Mosimanecape Jeremiah Sesing**

Capacity: Director and Key Individual

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

**Andrew Tokkie**

Capacity: Director

Date: \_\_\_\_\_