

Treating Customers Fairly Policy

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Thor Insurance Brokers (Pty) Ltd,
FSP 8400



**TREATING CUSTOMERS
FAIRLY**

TCF

WHAT IS TREATING CUSTOMERS FAIRLY (TCF)?

Treating Customers Fairly (TCF) is a regulatory initiative which requires companies to consider how they treat clients through all the stages of the product's life cycle—from product development, marketing, advice, point-of-sale to after-sales service.

By encouraging companies to re-evaluate their company culture and to ingrain the attitude of TCF a more sustainable industry is envisaged.

Thor Insurance Brokers (Pty) Ltd wish to build long-lasting, mutually beneficial relationships with our clients

- We try to make it as easy as possible for clients to deal with us
- We endeavor to give clients a consistent experience every time they contact us, regardless of how they choose to contact us
- We believe in treating our clients fairly and in delivering on the **six outcomes** identified by the Financial Sector Conduct Authority (FSCA)

OUTCOME 1:

Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm's culture

- a) Customer centricity is part of, and integral to our business strategy (the strategy). It is clearly articulated in the strategy and internal and external communications. This strategy is reinforced by the related TCF documents which are embedded across all affected businesses units within the company.
- b) TCF is a standing item on our Management Agenda.
- c) Administration and record keeping systems are of a good standard and are reviewed periodically.
- d) As part of sustainable business practices, we will practice a balanced approach between treating customers fairly and commercial considerations as agreed by Senior Management.
- e) The oversight of the TCF outcomes is embedded in our compliance and control methodology as part of our on-going oversight and monitoring policy.
- f) Senior Management considers whether the TCF outcomes are applied to customers and in instances where potential unfair treatment of customers has been identified, senior management will implement the determined remedial action.
- g) We have trained all staff about TCF, and explained their role in delivering the outcomes.

OUTCOME 2:

Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly

- a) We have surveyed and segmented our customers, know what their needs are, and have a customer service proposition matched to their needs.
- b) We consider the customer value proposition in respect of all areas of the value chain, including the choice of appropriate distribution structures to support the insurance products.
- c) We have ensured that all advisers are fully trained in all aspects of any product features and risks and have a training and competence plan in place.
- d) We can confirm the market in which we operate or intend to operate.
- e) We ensure that the products meet the required customer segment needs as identified.
- f) There is a process whereby customers are offered a review of their circumstances and advice where this is appropriate to them and systems are in place to support this.
- g) We have a robust and clear 'know your client' process that ensures we understand what customers' circumstances and goals are before we look at services or products.
- h) We monitor customer feedback and experience post sale to ascertain the suitability of the business models and solutions for the targeted customer.
- i) We ensure that the customer is provided with all the information needed to make an informed purchasing decision.
- j) We ensure that all generated marketing and customer communication is designed for its intended target market and that it is easy to understand.

OUTCOME 3:

Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale

- a) We subscribe to and comply with applicable regulatory provisions directed at providing customers with information that is clear, fair, appropriate and not misleading. Literature prepared for customers is evaluated to ensure it is written in plain English. If the customer level necessitates it, regular and new customer facing documents are market tested with customers to validate clarity and understanding of the literature produced.
- b) We maintain up to date contact details of our customers and their circumstances and accurate, retrievable, secure records of product information and advice we have provided.
- c) We ensure that information to customers is provided in an appropriate format (via the appropriate delivery mechanism and in a timely manner) to ensure that it is accessible to customers.
- d) We ensure that product literature is available for the stages of a product's life cycle to explain product features, benefits and associated risks at point of sale, and changes to contractual benefits and market conditions after point of sale.
- e) We ensure that sales and customer-facing staff receive comprehensive training and are evaluated to ensure a good understanding and consistency of information delivered to customers.
- f) We ensure that customers have sufficient information to make an informed decision, prior to any transaction taking place.
- g) We ensure that the distributors and, where appropriate, outsourced service providers understand their TCF responsibilities. We will use our best efforts to ensure that distributors and outsourced service providers are appropriately trained and tested in this area.
- h) We ensure that back office and support staff receive the necessary training regarding communication to customers to ensure TCF is engrained in its culture and to ensure a consistent message is delivered.

OUTCOME 4:

Where customers receive advice, the advice is suitable and takes account of their circumstances

- a) We are committed to the delivery of suitable advice to customers, which takes into account their needs and circumstances
- b) Insofar as we are not authorised to provide advice to customers, we will in line with the Financial Advisory and Intermediary Services (FAIS) Act, undertake regular monitoring to ensure that TCF principles are applied when providing advice to customers. This includes monitoring of the quality of advice provided by our broker client, and not just compliance with rules
 - consider the individual needs of customers when providing advice in respect of new and existing products being offered to customers.
 - provide training to staff to reinforce our approach to the TCF outcomes that should be taken into account when rendering advice to customers and perform monitoring procedures to assess whether communications between customer facing staff and customers are appropriate with respect to the TCF outcomes.
 - provide adequate product training, and where necessary, attend product training provided by our product provider.
- c) We will maintain effective record keeping.

OUTCOME 5:

Consumers are provided with products that perform as firms have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect

- a) We maintain strong relationships with existing customers.
- b) We take the necessary steps to ensure that the expectations of customers relating to the quality of service provided and any guarantees or promises in product and marketing literature are met.
- c) Where ongoing advice and service is agreed, we have a process for measuring and delivering reviews. We monitor products carefully to ensure customers' expectations are met.
- d) We take care to clearly state the features, benefits and risks of each product.
- e) We ensure that clients are informed about the consequence of any action or inaction, and do not simply rely on them to read the terms and conditions.
- f) We ensure product performance is monitored to assess whether performance meets the needs of the target market and to evaluate its alignment with guarantees and benchmarks referenced in product literature.
- g) We ensure that service standard requirements are in place to support the delivery of quality service and fair treatment. We ensure that customers are informed of the service standards in relation to our responsibilities.
- h) We ensure that customers are encouraged to provide feedback on the quality of service and whether performance is meeting their expectations directly to our product provider. Such feedback is recognised as an invaluable source of TCF management information.
- i) We ensure that the customer has reasonable access to the relevant parties' post sale.

OUTCOME 6:

Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint

- a) We have a clear complaints process, treat verbal complaints seriously, and respond in writing where appropriate, keeping customers informed of progress. Our complaints-handling policy supports the fair treatment of customers.
- b) We ensure that customer complaints are tracked and complaints trends (root cause analysis) are identified and reported to Senior Management and our product provider. This monitoring function plays a proactive role in determining changes that are required to existing internal process and/or matters that relate directly to customer experience and the fair treatment of customers.
- c) We ensure that where potential customer detriment is identified through a single complaint, we consider the impact that this has on comparable customers who have not complained with a view to considering how best to address and rectify the issue where appropriate.
- d) We do what is reasonably necessary to promote and facilitate practices whereby customers are not faced with undue barriers when requesting changes to existing products and service providers. In this regard, we recognise that a balance is needed between making things easy for customers while ensuring that customer requests for policy changes remains in their best interest.
- e) We will keep record all complaints made by customers through a formalised complaints management process.
- f) We will respond to complaints received timeously and record evidence of complaint handling processes and resolution.
- g) We will notify our product provider of key themes arising that indicate the need for possible changes to products or service solutions.
- h) We ensure that clients can choose to move away from us if they wish, and do not create barriers to them for doing so.