

ALT CAPITAL

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PARTNERS

# **Treating Customers Fairly Guideline Document**

**Last Reviewed July 2018**



## INTRODUCTION

The Treating Customers Fairly (TCF) initiative is a key component of the Financial Services Board's broader consumer protection and market conduct mandate. TCF is an outcomes-based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms.

ALT Capital Partners (Pty) Ltd. incorporates TCF into the way that we conduct business every day and in the way that we deal with our clients. We may not outsource this responsibility to another party, although our compliance officer may provide guidance and assistance with regards to incorporating TCF into our business.

Our approach to TCF is reflected into the following organisational structures and processes:

Leadership: The Board and management provide direction and monitor the delivery of TCF behaviours and outcomes.

Strategy: The TCF aims are not merely stated vision and values, but built into our strategic and business plans.

Decision-making: Decision-making protocols ensure that all decisions that impact on customers are subject to the challenge implicit in our TCF strategy.

Governance and controls: Our governance structures and control mechanisms are designed to cater for TCF considerations and include TCF measurement systems and identification of TCF risks.

Performance management: Our staff and representatives are trained to deliver appropriate TCF outcomes. TCF deliverables form part of our staff performance contracts and performance is evaluated in terms of TCF competence and expectations.

Reward: Our remuneration, incentive and reward policies take cognizance of fair customer outcomes and ensure that conflicts of interest are avoided.



## **THE SIX TREATING CUSTOMERS FAIRLY FAIRNESS OUTCOMES**

We have incorporated the following 6 TCF outcomes into our business operations:

### **Outcome 1: Customers are confident that they are dealing with a firm where the fair treatment of customers is central to the firm culture.**

Integrity is one of our stated values and is central to the ALT Capital's culture of excellence and entrepreneurship. The Board constantly thinks about the strategic implications of TCF and how we treat our clients. The Board is involved with TCF decisions and ensuring TCF is well communicated to staff.

In terms of section 2 of the FAIS General Code of Conduct we must always render financial services honestly, fairly, with due skill, care and diligence and in the interests of clients and the integrity of the financial services industry.

All parties and businesses that ALT Capital contracts with are put through a thorough due-diligence process before contracting.

### **Outcome 2: Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.**

ALT Capital currently does not market products in the retail market. An investment ALT Capital Funds are suitable only for sophisticated and professional Investors and requires the financial ability and willingness to accept the high risks and lack of liquidity inherent in a speculative investment. Interests in the Fund will be subject to restrictions on transfer and Investors must be prepared to bear the risks of investment for the lifetime of the Fund.

### **Outcome 3: Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.**

We use clear explanations of the products when talking to our clients with the mechanics and risk profile of the product disclosed to the client in plain language. We generally like to keep our clients / investors informed of our own processes and information required by others in the value chain.

In terms of section 7 of the General Code of Conduct we must provide a reasonable and appropriate general explanation of the nature and material terms of the relevant contract or transaction to a client, and generally make full and frank disclosure of any information



that would reasonably be expected to enable the client to make an informed decision. All material terms are fully disclosed to clients through our private placement memorandum.

**Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.**

ALT Capital Investment Partners acts on behalf of the Fund only. We are not responsible for providing prospective Investors with the protections afforded to clients or for advising them on an investment in the Fund.

**Outcome 5: 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.**

We have partnered with a best-of-breed outsourced administration service provider to ensure accurate and objective product performance. All investments must pass our rigorous investment process before any investment is made.

**Outcome 6: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.**

ALT Capital makes it a priority to assist clients who have complaints. Our client complaint procedure policy document is available for download on our website should clients have a complaint.