

Treating Customers Fairly Policy

Introduction

Unless explicitly specified otherwise, any reference to “Netto” in this document shall encompass both Netto Invest (Pty) Ltd and Netto Capital (Pty) Ltd, which forms the Netto Group.

Netto is committed to ensuring that the Financial Sector Conduct Authority’s (FSCA) initiative of “Treating Customers Fairly” (TCF) is embedded in all areas of our business.

TCF is an outcomes-based regulatory approach aimed at ensuring that customers are treated fairly throughout the product and service lifecycle.

Purpose

We deeply value our clients and are committed to supporting them by:

- Embedding TCF principles into the culture and operations of Netto.
- Ensuring that all clients receive fair treatment in line with FSCA expectations.
- Promoting transparency, integrity, and client-centricity in all dealings.
- Protecting the interests of our clients at each stage of the advice process, from the very first meeting through to the regular annual reviews
- Endeavouring to meet our clients’ expectations of high quality service

Outcomes

Our TCF policy is centred on the FSCA’s guidelines and the six outcomes produced:

- **Outcome 1: Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture**
This outcome reflects a deep-rooted commitment within Netto to place client interests at the heart of our business practices. It means that fair treatment is not just a compliance requirement, but a guiding principle embedded in leadership decisions, staff training, performance management, and day-to-day operations. Clients should feel assured that every interaction with Netto is underpinned by integrity, transparency, and a genuine desire to deliver value and respect.
- **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**
Netto is expected to demonstrate a clear understanding of our client base and ensure that product development is driven by real client needs. This includes conducting thorough market research, segmenting clients appropriately, and tailoring offerings to suit those segments. Marketing and sales strategies should be aligned with this understanding, avoiding a one-size-fits-all approach and ensuring that products are not misrepresented or sold to unsuitable audiences.
- **Outcome 3: Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale**
Effective communication is key to enabling clients to make informed decisions. Netto must ensure that all product information, terms and conditions, and associated risks are presented in a clear, concise, and accessible manner. This obligation extends beyond the initial sale, requiring us to maintain open

channels of communication throughout the client journey, including updates, changes, and ongoing support.

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

When offering advice, Netto must take a holistic view of the client's financial situation, needs, and objectives. This means conducting thorough fact-finding and ensuring that any recommendations are appropriate, well-explained, and in the client's best interest. The advice process should be robust, documented, and subject to quality assurance to ensure consistency and accountability.

- **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**

Clients should be able to rely on the promises made by Netto regarding product performance and service delivery. This outcome requires Netto to manage expectations accurately and deliver consistently on those expectations. Any deviation from what was communicated must be addressed promptly and transparently, with a focus on resolving issues and maintaining trust.

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

Post-sale processes should be designed with the client's convenience in mind. Firms must avoid creating unnecessary obstacles that frustrate or delay legitimate client actions. Whether it's switching providers, making a claim, or lodging a complaint, the process should be straightforward, fair, and responsive. Clients should feel empowered to exercise their rights without undue burden or resistance.

Our Commitment

- We will perform a Full Needs Analysis upfront to ascertain the client's details, financial status and financial needs
- We will prepare a Record of Advice detailing all relevant information required by the client to make an informed decision
- We will disclose all costs and risks involved with the product being recommended
- We will make sure that the client understands the Record of Advice and any risks associated with any product recommended
- We will ensure that all Conflicts of Interest are clearly disclosed to enable the client to make an informed decision
- We will ensure that all client communications are clear, concise and free of jargon
- We will ensure that all Authorised Representatives have received training on the products being recommended to ensure they understand to which client group each product is most appropriate
- We will continuously ensure that all staff members fully understand the Six Outcomes detailed above
- We will listen to client feedback and will deal with any complaints timeously
- We will ensure that a mandate is signed between us and the client detailing the extent of our discretionary services
- Where a breach of mandate has taken place, we will rectify the situation so that the client is not prejudiced