

TREATING CUSTOMERS FAIRLY POLICY (TCF)

FOR

SILVERTREE RISK & WEALTH MANAGEMENT C.C

Registration no: 2006/226559/23

FSP29682

INTRODUCTION

At Silvertree Risk & Wealth Management C.C, we recognize the Financial Sector Conduct Authority (FSCA) as the guardian of market conduct and customer fairness. Our adherence to the FSCA's guidelines is not just a regulatory requirement but a cornerstone of our business philosophy, ensuring that every client interaction is conducted with integrity and in a manner that upholds their rights and the integrity of the financial market.

The FSCA prescribed 6 outcomes applicable to FSP's to ensure the fair treatment of clients and potential clients when providing financial services to such clients.

PURPOSE

FSCA prescribed 6 outcomes applicable to FSP's to ensure the fair treatment of clients and potential clients when providing financial services to such clients. Clients are valuable assets of an FSP and the FSP must at all times aim to protect the interests of its clients from the very first contact with such client, throughout the advice/intermediary process, continuing through to when annual reviews are conducted with such clients. FSP's should furthermore endeavour to meet clients' expectations and ensure the fair treatment of its clients by means of ensuring that the best most suitable financial advice and ongoing high-quality financial services is provided to such clients.

The essence of fair treatment extends beyond mere compliance; it is about cultivating enduring relationships built on trust and mutual respect. Our purpose is to consistently act in the best interest of our clients, safeguarding their financial well-being from the initial engagement through to the ongoing management of their financial affairs.

THE 6 TCF OUTCOMES

Each of the six outcomes prescribed by the FSCA is ingrained in our operations. From ensuring that our corporate culture prioritizes fair treatment (Outcome 1), to the design and targeting of our products and services (Outcome 2), through to the clarity and ongoing communication with our clients (Outcome 3), we are committed to the practical application of these principles.

The fair treatment of clients is centered around the following 6 outcomes laid down by the FSCA:

- Outcome 1: Consumers can be confident that they are dealing with firms where the fair treatment of Clients is central to the corporate culture.
- 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.
- Outcome 3: Clients are provided with clear information and kept appropriately informed before, during and after the point of sale.
- Outcome 4: Where consumers receive advice, the advice is suitable and takes account of their circumstances.
- 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.
- 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.

PRACTICAL EXAMPLES

We demonstrate our commitment to TCF through tangible actions. For instance, when advising a client on investment choices, we not only provide comprehensive fund fact sheets but also follow up to ensure the client's understanding and satisfaction with the products selected, reflecting Outcome 5 in real terms.

Silvertree is committed to ensure that the 6 TCF Outcomes is embedded in all areas of its business and undertakes specifically to:

General Code of Conduct (all FSPs):

- Make full disclosure to the Client of the relevant details of FSP's license, Key Individuals, Representatives, financial products authorised for, address, contact details, Complaints process, compliance department and insurance held, at its earliest opportunity.
- Conduct a Full Needs Analysis to ascertain the Client's financial position, financial needs and goals.
- Conduct a proper risk analysis of the Client's risk appetite towards investments.
- Consider various suitable financial products and prepare a Record of Advice detailing all relevant information required by the Client to enable the Client to make an informed decision.
- Should the Client replace an existing financial product, to provide the Client with a comparison of all material aspects to enable the Client to make an informed decision whether or not to replace such financial product.
- Disclose all remuneration, costs and risks associated with the financial product being recommended.
- Where there is investment advice ensure that detailed fund fact sheets have been sent to the Client to enable the Client to make an informed decision.
- Ensure that all Conflicts of Interest are clearly disclosed to enable the Client to make an informed decision.
- Ensure that all client communications are clear, concise and free of jargon.
- Ensure that all authorised Representatives have received training on the financial products being recommended from the various product suppliers.
- Continuously ensure that all staff members fully understand the 6 TCF Outcomes detailed above and how to apply it to their daily activities and interactions with Clients.
- Listen to client feedback and deal with any Complaints timeously.

Client-Centric Approach

Our client-centric approach is not just a statement; it's a practice embedded in every layer of our service. We pledge to always prioritize our clients' needs, ensuring that every decision made and every service offered aligns with their best interests.

Product Suitability

We rigorously assess the suitability of our products for our clients, ensuring alignment with their needs, goals, and risk profiles. Our advisors goal is to match clients with solutions that are appropriate for their unique financial situations.

Transparency and Communication

We pledge to maintain the highest standards of transparency in all our client dealings. This means clear, jargon-free communication, upfront disclosure of all fees and charges, and regular, understandable updates on their investments and our services.

Advice and Recommendations

Our advice is always tailored to each client's specific circumstances. We take into account their financial situation, goals, and risk appetite to ensure that our recommendations are suitable and beneficial for them.

Performance and Service Standards

We monitor our products and services to ensure they perform as expected, and we hold ourselves to high service standards. If a product falls short, we have measures in place to address and rectify the situation promptly.

Post-Sale Practices

Our commitment to fairness extends beyond the sale. We ensure that clients face no unreasonable barriers when they wish to switch products or providers, submit a claim, or register a complaint.

Staff Training and Competence

We are continuously training our staff to ensure they are not only competent in their roles but also fully understand and can implement the TCF outcomes in their daily interactions with clients.

Feedback and Complaints Handling:

Client feedback is invaluable to us. We have established mechanisms for clients to easily provide feedback and lodge complaints, and we are committed to addressing and resolving these promptly and fairly.

Policy Review and Adaptation

We regularly review our TCF policy to ensure it remains effective and relevant. This includes adapting to changes in regulatory requirements, market conditions, and the evolving needs of our clients.

Member Endorsement

As members of Silvertree Risk & Wealth Management C.C, we personally endorse and commit to upholding the principles and practices outlined in our TCF policy. We lead by example, ensuring that our team embodies these values in every client interaction.

Accessibility of Policy

We believe in transparency and accountability, which is why our TCF policy is readily accessible to all clients. It is available on our website and can be provided upon request, ensuring that our clients are fully informed of our commitment to fair treatment.

Agreed and adopted by all Members of Silvertree Risk & Wealth Management C.C – updated November 2023:

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