

Treating Customers Fairly Policy

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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.

Trine Capital 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 a stated vision and values, but are 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 on the 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 Outcomes

Our clients, who have entrusted us with their hard-earned capital, are and will always be our main priority. We believe that our success lies not only in delivering a world class investment experience, but also in ensuring that our clients are always treated fairly and with the utmost level of integrity, transparency and respect.

Our TCF policy is centred around the guidance provided by the Financial Services Board (FSB) and our external Compliance Officer. This policy, together with our transparent business model, ensures that we consistently deliver fair outcomes to our clients.

The FSB has outlined six key outcomes, which are central to the TCF initiative:

- Outcome 1** Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture.
- 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.
- Outcome 3** Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
- Outcome 4** Where customers receive advice, the advice is suitable and takes account of their circumstances.
- 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.
- Outcome 6** Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

Our Service Commitment

At Trine Capital:

- A TCF policy has been adopted by the Board and the organization. All staff has been made aware of the TCF principles and what is required of them when dealing with clients;
- We ensure that we have a thorough understanding of our clients' needs, which enables us to provide them with the products best suited to their requirements;
- We communicate with our clients in a clear, accurate and transparent manner;
- We ensure that the products and services that we offer are well explained and fully transparent, both before the point of contracting as well as during and after the point of contracting;
- We ensure that all applicable risks are communicated and understood by our clients and potential clients;
- We do not provide financial advice. However, should advice be given in the future, Trine Capital will ensure that its product information is such that the representative providing the advice is able to keep clients informed of all risks and any potential consequences related to the investment. A thorough record of advice and financial needs analysis would be conducted.
- We take TCF standards into account when allowing a strategic partner to 'wrap' or distribute our products or when selecting which platform we put them on;
- We actively avoid conflicts of interest, and where a conflict of interest is deemed unavoidable, we will disclose this to the client, together with the mitigation strategy employed;
- We are committed to ensuring that clients do not face unreasonable post-sale barriers to changing products, switching providers or making complaints;
- We ensure all client complaints are dealt with in a thorough, fair and timely manner.

These TCF outcomes are central to our corporate culture. We realise that our employees play an integral part in enabling us to deliver on this service commitment. We therefore ensure that our employees are fully trained in dealing with our clients, in a fair and transparent manner.