



TREATING CUSTOMERS FAIRLY (TCF) GOVERNANCE POLICY

ESB Insurance Brokers (Pty) Ltd (hereinafter referred to as ESB) appreciates that all Stakeholders perceptions, including their clients, affect the company's reputation and are therefore continuously striving to achieve the appropriate balance between all stakeholders in the best interests of ESB as well as those of its clients which is key. King IV principles being the guiding light, if not specific, given our size and complexity of business, but as a smaller company the primary focus of our governance framework from ESB and our client perspective is TCF.

In line with the Financial Services Board (FSB), now the Financial Sector Conduct Authority (FSCA), adoption of a "Treating Customers Fairly" (TCF) framework, as the basis for its supervision of the conduct of business of regulated financial institutions, ESB is committed to ensuring that the TCF framework is applied in all areas of our day to day business activities, as per the below policy statement.

In adopting the TCF framework we recognise that the fair treatment of our clients is central to our core principles, and to the service we offer and we ensure that:

- TCF OUTCOME 1: Our clients can be confident that they are dealing with a regulated financial institution where TCF is central to our culture.
- TCF OUTCOME 2: Products and services that we offer, are designed to meet the identified needs of our clients, and we target them accordingly.
- TCF OUTCOME 3: Our clients are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- TCF OUTCOME 4: Where advice is given, it is suitable and takes account of our clients circumstances.
- TCF OUTCOME 5: Our insurers products perform, as they have led our clients to expect, and their service is of an acceptable standard as we have led our clients to expect.
- TCF OUTCOME 6: Our clients do not face unreasonable post-sale barriers to change or replace a policy, change Insurer, submit a claim or make a complaint.

In addition, we promote the alignment of interests of our company policy with those of our clients which avoids us from excessive risk taking and unfair treatment of our clients.

We also provide for regular monitoring and evaluation of the adequacy and effectiveness of our systems, processes and internal control mechanisms and measures to address any deficiencies and to determine whether it reasonably serves to ensure the integrity of our practices, including the treatment of our clients with due care, skill and diligence and in a fair, honest and professional manner. This policy is therefore also aligned to our operational ability, controls and procedures to ensure ongoing good governance.

Where we appoint Representatives, we ensure that such appointment does not prevent us from acting in the best interests of our clients and that their remuneration may not increase the risk of unfair treatment to our clients. We have also developed contingency plans to ensure a continued service to our clients in the event that the Representative's appointment is terminated or becomes ineffective.

In practical terms for the different areas of our business this means:

- Our Staff have thorough training on all insurers products and understand who they are suitable for and our staff are additionally encouraged to challenge insurers where they spot inconsistencies, ambiguities or potential unfairness in the policy.
- We keep detailed records of our clients instructions given before, during and after issuing a policy, to ensure that we can deal with any complaints that may arise from them fairly, promptly and impartially, and in line with regulated rules.
- We encourage contact with our clients, where appropriate, to correct or improve on the service we have already offered so that our staff can recommend improvements following client complaints as well as report back on the outcomes.
- All of our staff implement TCF in their day to day business activities and have regular training in its principles and practices to ensure that the companies TCF framework and values are supported by all staff and understood in the same way.