TCF Policy

Beyond Intermediary Services (Pty) Ltd
FSP No.: **51405**
(The Company)

	Date	Author	Description
V01	6 June 2025	Eduann Vorster	1st Draft

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1. Introduction

The Directors of Beyond Intermediary Services (Pty) Ltd took a decision to formally adopt the TCF outcomes and principles to assist to guide business to embrace and enforce the principles of fairness and objectivity in all daily processes of the business.

Our ethos and culture has always been to:

- Operate with transparency and honesty;
- Empower our clients to enable them to make informed decisions;
- Aim to "Wow" all client's in our approach to service delivery;
- Work with purpose and as a team, delivering simple and practical solutions to complex problems;
- To accept nothing less than the best for our clients in terms of service excellence, client centricity and all business related communication; and
- Be sensitive and understanding of our clients' needs

2. Objectives

Beyond Intermediary Services, as an authorised financial services provider, is fully committed to ensuring that our customers are treated fairly at all times.

To ensure that a TCF culture is cultivated within our FSP, we have focused attention on high quality service delivery, fair treatment of customers and transparency remaining the centre of our focus as an organisation at all times.

We undertake to ensure that quality management systems, processes, procedures and controls are formulated, implemented, reviewed and monitored to ensure, as far as possible, that clients experience professional servicing standards and fair treatment on all levels of interaction.

We undertake to provide training and to equip each staff member on the principles contained herein and also to be and remain active participants in cultivating the TCF culture.

3. The six outcomes of Treating Customer Fairly

As a financial services provider, we embrace the spirit of the principle-based outcomes as published by the Financial Sector Conduct Authority; we are committed and will continuously strive to comply with these outcomes:

Outcome 1
Customers are confident that they are dealing with providers where the fair treatment of customers is central to the FSP's culture.

Outcome 2
Products and services marketed and sold in the retail market are designed to meet the needs of the 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 providers 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.

4. Achieving the outcomes

We realise that the success of achieving the fairness outcomes first and foremost lies in the way that we manage our FSP. We are convinced that quality management systems, policies, procedures, controls and appropriate training are necessary for bringing to fruition our best intentions which rise from these Outcomes.

We further agree that each role player within our FSP must embrace the TCF outcomes and understand that each person has an important contribution to make in order for the FSP to consistently achieve these goals, collectively.

We also aim to demonstrate through our behaviour and monitoring that we are consistently treating customers fairly through our governance structures as well as throughout the stages of the product life cycle, which are summarised below.

4.1 Leadership

4.1.1 The TCF objectives have been adopted by Beyond Intermediary Services management and who have taken responsibility for them.

4.1.2 Management shall endeavour to conduct regular reviews of the main business processes to identify areas requiring improved TCF outcomes.

4.1.3 TCF objectives shall be communicated to all staff across the business.

4.1.4 A process for assessing staff and management understanding of TCF and the organisation's TCF commitments will be sourced and implemented.

4.1.5 Staff who contribute to the provision of financial services to retail customers are required to understand their role in delivering TCF outcomes to those customers.

4.1.6 We have incorporated the TCF outcomes as part of our vision, mission and values statement.

4.2 Strategy

4.2.1 As part of our strategic planning process, we shall provide for the explicit consideration of TCF implications of any new strategy or change in strategy and the FSP's strategic plan shall include the TCF deliverables.

4.3 Decision-Making

4.3.1 We will consider TCF objectives when taking decisions in all business cases or projects (including expenditure) undertaken by Beyond Intermediary Services.

4.3.2 We have established an internal TCF forum for the purpose of providing an opportunity for all role-players within our FSP to raise any questions or concerns regarding TCF-related matters and engage in healthy debate thereof.

4.4 Governance & Controls

4.4.1 Oversight and monitoring of the TCF outcomes has been assigned to our internal TCF forum as well as an external compliance services provider.

4.4.2 Beyond Intermediary Services shall formulate, implement, regularly review and monitor processes.

4.4.2.1 to ensure formal and regular reporting of the progress of the implementation of TCF deliverables.

4.4.2.2 for identifying and reporting TCF risks or failures.

4.4.3 The management of TCF and market conduct risks shall be formally included in the risk management framework of Beyond Intermediary Services.

4.4.4 Beyond Intermediary Services governance framework shall be evaluated continually to ensure that it is effective in achieving the TCF outcomes.

4.5 Performance Management

4.5.1 Staff members have been identified who will be responsible for the delivery of the TCF outcomes within Beyond Intermediary Services.

4.5.2 Performance evaluation criteria shall be formulated and implemented to incorporate TCF objectives and shall be rigorously applied at all levels.

4.5.3 All staff members are required to undergo continuous training on TCF principles, standards and deliverables.

4.5.4 Recruitment processes have been formulated and implemented to ensure staff in relevant positions will have the necessary skills to deliver the FSP's TCF objectives.

4.6 Measurement and Management Information

4.6.1 Management Information (MI) measures are designed and implemented for TCF monitoring.

4.6.2 Beyond Intermediary Services will furthermore determine processes to obtain MI on customer expectations and how these expectations are updated and amended on an ongoing basis.

4.6.3 Processes are formulated and implemented to collate and summarise TCF related MI in a meaningful way that provides a complete overview of the progress to which Beyond Intermediary Services is delivering TCF outcomes to customers, including, but not limited to, concrete examples of such progress.

4.6.4 Processes are formulated and implemented to enable Beyond Intermediary Services to analyse and act on MI findings to improve TCF outcomes for customers.

4.6.5 MI findings will be analysed to identify staff training needs as well as for performance management purposes.

4.6.6 Beyond Intermediary Services shall communicate transparently with our stakeholders (including the market conduct regulator) on our progress in achieving TCF outcomes and also make information regarding our progress publicly available.

4.6.7 Over and above "business as usual" MI, Beyond Intermediary Services shall have mechanisms in place when requested to monitor and respond to changes in the broader environment, to enable us to pro-actively identify TCF related risks.

4.6.8 Beyond Intermediary Services will provide concrete examples, supported by MI, of improvement in the extent to which we are delivering TCF Outcomes to customers, particularly in respect of products and services.

4.7 Clear and Appropriate Information

4.7.1 Beyond Intermediary Services shall assess the clarity, appropriateness and fairness of product information provided to customers, whether produced by Beyond Intermediary Services, or other third parties in order to ensure that any information we provide regarding our services are accurate, clear, fair and not misleading.

4.7.2 Beyond Intermediary Services shall formulate, implement, regularly review and monitor an approval process for all product related information for which compulsory sign-off by senior management is required.

4.7.3 Beyond Intermediary Services shall regularly review standardised product information we use to ensure that it remains accurate, clear and appropriate to the applicable customer groups.

4.7.4 Beyond Intermediary Services monitor and act on feedback, complaints and suggestions received from customers, staff or any other interested party that identifies the need for improvement in our product information.

4.7.5 Beyond Intermediary Services shall ensure relevant and adequate product information is provided to customers (whether by our own staff or by other third parties) at an appropriate time to enable them to make an informed decision as to whether to enter into the relevant contract.

4.7.6 Beyond Intermediary Services is required to provide existing customers with key information on products on a regular ongoing basis after contracting, through appropriate channels.

4.7.7 Beyond Intermediary Services commits to ensure that clients are informed of any recent or pending changes to the changes to client's products and portfolio's, contractual events or any actions required from them, in sufficient time, to enable them to reasonably respond to or act on the information.

4.7.8 Beyond Intermediary Services shall control the accuracy and quality of product information provided by staff.

4.7.9 Beyond Intermediary Services is required to maintain up-to-date contact details of existing customers.

4.7.10 Beyond Intermediary Services commits to ensure that our customers have current and accessible contact points if they need product or service information and need to get in touch with Beyond Intermediary Services for any reason whatsoever.

4.7.12 Beyond Intermediary Services is required to ensure that accurate, retrievable, secure records are maintained of all product information which has been provided to customers and any other material interactions with customers.

4.8 Advice

4.8.1 Prior to any decision to market a product, the provider is required to assess whether or not we have the appropriate skills and business processes in place to provide advice and service that will be suitable for our target market and product concerned.

4.8.2 Prior to contracting with any product supplier to market their products, the provider shall conduct a full due diligence, customer research and appropriate testing to ensure we have the appropriate comfort to satisfy ourselves that such products and service levels are likely to meet our customers reasonable expectations.

4.8.3 Beyond Intermediary Services shall monitor and act on feedback or complaints received from customers or other third parties regarding the quality of service.

4.8.4 Over and above complaints, Beyond Intermediary Services is required to monitor potential TCF indicators such as insurance claims experience, product retention, early termination data, type and frequency of product changes, etc. in relation to the customers associated, to identify and mitigate risks.

4.8.5 Beyond Intermediary Services formulate and implement controls to identify and address any conflicts of interest between ourselves and our customers.

4.8.6 Agreements between Beyond Intermediary Services and any other FSP must clearly set out the parties' respective responsibilities in relation to customer selection of products, information and service support. Customers must be able to understand who they should look to in relation to different aspects of the financial products or service provided to them.

4.8.7 Beyond Intermediary Services for the compensation of customers who have been financially prejudiced as a result of poor service provided by ourselves.

4.8.8 Beyond Intermediary Services will be required to ensure that published decisions of the FAIS Ombud, guidance from the regulators and other relevant information sources in relation to products selected are analysed by management so as to evaluate whether our existing practices remain relevant and effective.

4.9 Product Performance Expectations

4.9.1 Beyond Intermediary Services will thoroughly analyse the product retention, product switching, early termination behaviour of our customers to identify risks that products or services are not meeting expectations created.

4.9.2 Beyond Intermediary Services shall formulate and implement:

4.9.2.1 processes to alert customers to the risks of particular actions on their part (such as early termination, non- payment of contributions, product s switches, benefit reductions) in reasonable time for them to respond to or act on the information.

4.9.2.2 processes to alert customers to the risks of non-action on their part, such as a failure to review insurance cover needs, beneficiary nominations and other relevant requirements.

4.9.2.3 clear service standards for customer service processes which shall be communicated to customers.

4.9.2.4 Beyond Intermediary Services shall implement processes to protect the confidentiality of all customer information.

4.9.3 Beyond Intermediary Services may conduct research or test the service standards to determine whether we are in line with customer/ member expectations.

4.9.4 Although Beyond Intermediary Services explicitly cannot accept responsibility for the performance of products or of product suppliers, or which product options the customer has selected, processes are to be formulated and implemented to mitigate the risks to our customers/members where it becomes apparent that products are not performing or are unlikely to perform as customers have been led to expect.

4.10 Changing Products

4.10.1 Beyond Intermediary Services commits to ensure that customers are informed (in good time, not only upon request) of the types of changes they may make to their products if their needs or circumstances change and of any important limitations on their ability to access funds or make changes.

4.10.2 Beyond Intermediary Services is required to ensure that when/if we become aware of a change in a customer's needs or circumstances (including affordability difficulties), they are informed of changes they may consider making to their products to meet their changed requirements.

4.10.3 Beyond Intermediary Services has clear service standards in place for processing product changes (including where we need to refer the request to another party to deal with) and these are communicated to our customers.

4.10.4 Where a request for a product change is declined by any party in the value chain, the customer will advise the customer with clear reasons for this.

4.10.5 When a request is received to change a product, Beyond Intermediary Services is required to inform the customer of any potential risks associated with the change, in reasonable time, for them to respond to or act on the information.

4.11 Switching Providers

4.11.1 Beyond Intermediary Services must have clear service standards in place for processing switches to other providers which shall also form part of the customer servicing mandate.

4.11.2 When we receive a request to switch providers (whether directly or through another party), Beyond Intermediary Services shall inform the customer of any potential risks associated with the switch.

4.12 Claims and Disbursement Handling

4.12.1 Beyond Intermediary Services commits to ensure that customers are informed of how to submit a claim or disbursement request and of our service standards for claims and disbursement processing and what information we will need to process the claim or request.

4.12.2 Beyond Intermediary Services shall ensure that customers are informed prior to contracting, of the circumstances under which claims, or disbursement requests will not be processed and must ensure that the customer's obligations are explained.

4.12.3 Beyond Intermediary Services commits to ensure that once a claim has been received, that customers/members are constantly informed of progress.

4.12.4 Beyond Intermediary Services shall analyse types of claims and claims repudiation experience to identify any miss-selling risks.

4.13 Complaints Handling

4.13.1 Our complaints process has been tested to ensure it is accessible and appropriate for our customer groups.

4.13.2 Beyond Intermediary Services shall implement a robust complaints management, record keeping and root cause analysis process.

4.13.3 Beyond Intermediary Services commits to ensure that customers are informed (before complaint stage) of how to complain and of options for further recourse if they are dissatisfied with the outcome of a complaint.

4.13.4 Beyond Intermediary Services may benchmark our complaints handling (volumes, resolution rates, Ombud complaints) against competitors.

4.13.5 Beyond Intermediary Services commits to ensure that once a complaint is received, we keep customers informed of the progress (including the contact person details) whether we are dealing with the complaint ourselves or have referred it to another party.

4.13.6 Beyond Intermediary Services will, when responding to a complaint, endeavour to provide clear reasons for our response (including where the response is favourable to the customer), with supporting evidence where relevant.

4.13.7 Beyond Intermediary Services will ensure that where a request for redress is declined, wholly or partially, we inform the customer/ member of what steps they can take to have the decision reviewed.

4.13.8 Beyond Intermediary Services has clear service standards in place for processing complaints and ensures these are communicated to our customers.

4.13.9 Beyond Intermediary Services shall ensure that specific training is provided to staff that are tasked with complaints handling.

4.13.10 Beyond Intermediary Services shall ensure that complaints processes are structured to ensure that decisions will be objective, fair, consistent for similar complaints and that decision makers do not have a conflict of interest.

4.13.11 Beyond Intermediary Services may implement follow-up processes to determine customer satisfaction levels after complaints are finalised.

4.13.12 Beyond Intermediary Services is required to implement processes to ensure consistency in complaints handling.

4.13.13 Beyond Intermediary Services for fair compensation of customers who have been financially prejudiced by unfair treatment, and is not limited only to those customers who complain.

4.13.14 Beyond Intermediary Services will analyse complaints to identify any risks.

4.13.15 Beyond Intermediary Services is required to consider the nature of complaints received and complaints handling performance of different product suppliers in deciding whether to do business with them or recommend them or their products to customers.

5. Ownership and Accountability

This policy is owned by Beyond Intermediary Services (Pty) Ltd, an authorised financial services provider in terms of the Financial Advisory & Intermediary Services Act (37 of 2002). Beyond Intermediary Services accepts responsibility for the successful implementation of Treating Customers Fairly processes, procedures and controls in respect of the TCF Outcomes and objectives.

As Key Individual of the provider, Eduann Vorster, hereby confirms the adoption of the policy.