

Revised: January 2023

Treating Customers Fairly (TCF) “Policy”

Policy Statement

A key principle in Aylett & Co. Fund Managers’ (“Aylett”) culture is that our clients come first. Aylett is committed to the fair treatment of all clients, irrespective of their size or the vehicle through which they invest. Aylett recognises that client satisfaction is the foundation on which to build an investment business that is sustainable over the long term. Delivering optimal client outcomes is an enterprise-wide responsibility and requires participation from all parts of the business.

Apart from any legislative or regulatory obligations, treating customers fairly is a business imperative. Without clients we have no business. We are conscious that clients have many options when selecting a fund manager, and assets under management can leave us on 24hrs notice. Hence, putting our clients’ needs at the forefront of what we do is a business priority.

Aylett welcomes the Financial Services Conduct Authority (FSCA) Treating Customers Fairly initiative and will do its utmost to embed the desired values and outcomes in its corporate culture.

Values

As a financial services provider (FSP) we adhere to the codes of conduct in terms of the Financial Advisory and Intermediary Services Act (FAIS), namely the rendering of financial services honestly, fairly, with due skill, care and diligence, and in the interest of clients at all times.

Treating Customers Fairly

The Financial Services Board (“FSB”) (FSCA?) published its “Treating Customers Fairly (“TCF”) Roadmap” in March 2011 as a first step towards achieving TCF fairness outcomes and culture framework requirements. In particular, the FSB (FSCA?) requires FSP’s to measure their activities against six TCF fairness outcomes (the “Outcomes”) that aim to reduce market conduct risks and protect consumers of financial products:

- **Outcome 1 (“Culture”)**: Consumers can be confident that they are dealing with the Company where the fair treatment of customers is central to corporate culture.
- **Outcome 2 (“Products and Services”)**: 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 (“Clear and Appropriate Information / Point-of-Sale”)**: Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- **Outcome 4 (“Customer Advice”)**: Where consumers receive advice, the advice is suitable and takes account of their circumstances.
- **Outcome 5 (“Product Performance”)**: Consumers are provided with products that perform as the Company has led them to expect, and the associated service is of an acceptable standard and what they have been led to expect.

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- **Outcome 6 (“Post-Sale Barriers / Complaints Handling”):** Consumers do not face unreasonable post-sale barriers imposed by the Company to change product, switch provider, submit a claim or make a complaint.

Achieving the Outcomes and our Commitment thereto:

At Aylett & Co. we will aim to demonstrate through our behaviour and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle to which we contribute as follows:

- **Culture**

At Aylett we pride ourselves on our commitment and service to our clients. If we didn’t have clients we wouldn’t have a business. As a result, we have embedded in our company, a culture of treating clients fairly. It is part of our DNA.

Aylett and its staff are invested alongside our clients in our own products. This partnership effectively forces us to “eat our own cooking”. To labour the point, we share in our client’s upside and downside. As investment professionals, if the product is good enough for us, it’s good enough for our clients as well.

All our members of staff are trained to deal with our clients and are committed to maintaining very high standards of service and will continuously ensure that all staff members fully understand the Six Outcomes as detailed above.

Aylett fosters a culture of meritocracy. The success of the staff is aligned with the success of the business through a profit-share model, as we want our employees to think and act like an owner. We believe that our staff remuneration is structured in such a way which encourages them to deal with our clients in a fair and unbiased manner.

- **Product and services:**

We develop a product when we believe that a new mandate can sustainably meet a clearly defined investor's need, and in areas where we have adequate capacity, resources, and expertise to deliver results over meaningful periods.

Our products have been developed in a way that the fees payable by clients are reasonable and fair and are not structured in a way that gives rise to up-front charges, hidden penalties, and unreasonable ongoing fees.

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.

- **Clear and Appropriate Information:**

- We communicate with our client’s at all points of the sale process in a way that is clear, transparent and not misleading or unfair.

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- We are committed to making sure all our product material is in plain language prior to launching and after launching the product.
- We ensure that all client communications are clear, concise, and free of jargon.
- Minimum Disclosure documents are produced quarterly for funds being managed, which clearly detail composition, costs, and performance.
- Engagement with our institutional clients takes place on an ongoing basis through frequent interaction at client meetings, investment report-backs, and operational due diligence. A dedicated Business Development Manager ensures that clients' requests for information are attended to timeously.

➤ **Customer Advice:**

Aylett does not give advice. Clients would receive advice from their financial planners.

Although financial advisory services do not form part of our regular business, we strive to give our clients an excellent understanding of our products through regular communication and presentations.

➤ **Product Performance:**

We provide clear and fair information to enable customers to make informed decisions about transacting with Aylett, our products, and services. Product risks, commitments, limitations, and charges must be transparent.

Minimum Disclosure Documents are produced quarterly so that performance, current key information and statistics can be reviewed in relation to its peer group and benchmark.

➤ **Post-Sale Barriers:**

Aylett is committed to ensuring the clients do not face unreasonable post-sale barriers to changing products, switching providers or making complaints.

- Withdrawals are processed timeously on receipt of a valid Unit Trust Redemption form.
- Clients are free to withdraw their investment at any time in accordance with the terms and conditions of the fund.
- We do not impose any exit penalties, surrender fees or other charges to discourage clients from withdrawing.

Client criticism

- Both positive and negative feedback, is a crucial feedback mechanism in prioritising our focus and resources
- Aylett has a formal "Customer Complaints Procedures" that is available to clients on our website.
- Aylett is committed to handling client complaints in a timely and fair manner and has implemented systems and procedures to satisfy this commitment.
- We provide a number of avenues for clients to provide feedback and/or log a complaint, namely: telephone; email; post; fax; and/or through their relationship consultant (if

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applicable). Clients are kept updated throughout the complaints process to ensure that their expectations are managed throughout.

➤ **Other examples of TCF principles evidenced in our approach to daily business**

- Best execution and fair allocation of trades to all clients' portfolios. We do not favour any products or portfolios over and above others.
- We continue to place a high priority on ensuring that we comply with all regulatory and statutory obligations, as well as industry best practices.
- Where a breach of mandate has taken place we will rectify the situation so the client is not prejudiced.
- We have a consistent fee methodology which is reviewed across all product vehicles and mandate spectrums.
- We encourage and welcome feedback from staff and customers on our services and procedures.
- Before we engage with a third party we will satisfy ourselves of their commitment to treating customers fairly through consideration of their TCF policy and information that they can provide to demonstrate the fair treatment thereof.

POLICY APPROVAL

This policy has been considered and approved by the Management Committee of Aylett & Co.