



TREATING CUSTOMERS FAIRLY AND DUTY OF CARE POLICY

The purpose of this policy is to affirm our commitment to treating customers with fairness, transparency, and integrity throughout their entire engagement with our financial services. This policy ensures that Barko delivers specific, clearly defined fairness outcomes to all our financial customers. As a regulated entity, we adhere to the six TCF outcomes throughout the product life cycle: product design, promotion, advice, servicing, complaints, and claims handling. These outcomes ensure that our customers can trust our commitment to fairness, receive transparent and timely information, and encounter no unreasonable obstacles when seeking to change products, switch providers, file claims, or lodge complaints. Through this policy, we aim to align our organisational culture and business processes with the principles of fairness and transparency, ensuring that every customer interaction upholds these values.

Table of Contents

1.	Definitions and Acronyms	3
2.	Introduction.....	6
3.	The Internal TCF Officer	7
4.	Outcome 1 – Culture and Governance	8
4.1	Objective	8
4.2	Procedures Implemented to achieve the objective.....	8
4.3	Employee Participation	8
4.4	Management Information and internal communication.....	9
5.	Outcome 2 – Products and Services Suitability	9
5.1	Objective	9
5.2	Procedures implemented to achieve the objective	9
5.3	Employee Participation	10
5.4	Management information and internal communications	10
6.	Outcome 3 – Communication/Disclosures	11
6.1	Objective	11
6.2	Procedures implemented to achieve the objective:	11
6.3	Employee Participation	12
6.4	Management information and internal communications	13
7.	Outcome 4 – Suitable Advice.....	14
7.1	Objective	14
7.2	Procedures Implemented in order to achieve objective.....	14
7.3	Employee Participation	15
7.4	Management information and internal communications	16
8.	Outcome 5 – Product Performance and Service Expectations.....	17
8.1	Objective	17
8.2	Procedures implemented in order to achieve objective	17
8.3	Employee Participation	18
8.4	Management information and internal communications	19
9.	Outcome 6 - No unreasonable post-sale barriers, changes, complaints and claims.....	20
9.1	Objective	20
9.2	Procedures Implemented to Achieve Objective	20
9.2.1	Changing Products:	20
9.3	Employee Participation	22
9.4	Management information and internal communications	23
10.	Non-Compliance.....	24
11.	Review and Monitoring	25
12.	Review Date Schedule	25
	Annexure “A”	26
	Annexure “B”	29
	Annexure “C”	30
	Annexure “D”	34

1. Definitions and Acronyms

Advice	<p>Advice means any recommendation, guidance or proposal of a financial nature furnished, by any means or medium, to any customer or group of customers:</p> <ol style="list-style-type: none"> in respect of the purchase of any financial product or in respect of the investment in any financial product or on the conclusion of any other transaction, including a loan or cession, aimed at the incurring of any liability or the acquisition of any right or benefit in respect of any financial product or on the variation of any term or condition applying to a financial product, on the replacement of any such product, or on the termination of any purchase of or investment in any such product, and irrespective of whether or not such advice: <ul style="list-style-type: none"> is furnished in the course of or incidental to financial planning in connection with the affairs of the customer or results in any such purchase, investment, transaction, variation, replacement or termination, as the case may be, being affected;
Administration Services	Means to provide customers with factual information, assist them in submitting claims, and facilitate escalating complaints. These services focus on managing insurance policies or financial products without offering advice or acting as intermediaries. They aim to help customers navigate administrative tasks and enhance their overall experience with insurance-related matters.
Barko	Barko Financial Services (Pty) Ltd is a private company with registration number 1999/022139/07, a Credit Provider duly registered with the National Credit Regulator with registration number NCRCP 1764, and a Category I authorised Financial Services Provider duly registered with the Financial Sector Conduct Authority with registration number FSP 45614.
Credit Life Insurance	Credit Life Insurance means mandatory cover in terms of Section 106 (1) (a) of the NCA payable in the event of a consumer's death, disability, terminal illness, unemployment, or other insurable risk that is likely to impair the consumer's ability to earn an income or meet the obligations under a credit agreement.
Factual Information	refers to objective and accurate details about financial products or services provided to a customer without including personal opinions, recommendations, or subjective interpretations. This information is presented transparently and non-misleadingly, empowering customers with the necessary knowledge to make informed decisions regarding their financial needs and objectives.
FAIS Act	means the Financial Advisory and Intermediary Services Act 37 of 2002, as amended.
FAIS General Code of Conduct	means the General Code of Conduct for Authorised Financial Services Providers and Representatives published in Board Notice number 80 of 2003 and amended.
Policyholder Protection Rules 2017 (PPR's)	refer to regulations and guidelines established to safeguard the interests of policyholders and ensure the long-term viability and stability of insurance policies. These rules typically include provisions related to marketing + advertising, sales, claims, complaints, policy surrender values, premium increases, cancellations, replacements, grace periods, policy reinstatement, non-forfeiture options, and other aspects aimed at protecting the rights and benefits of policyholders throughout their insurance policies.
Financial Service Provider	is a person/legal entity that provides a financial service (advice and / or intermediary services) as a business or as part of a business authorised by the FSCA.
Funeral Insurance Products	<p>The Barko Funeral Products includes 4 (four) funeral products being the following:</p> <ul style="list-style-type: none"> Barko Family Standard Funeral Policy Barko Family Premium Funeral Policy

	<ul style="list-style-type: none"> • Barko Family Standard Plus Funeral Policy • Barko Family Premium Plus Funeral Policy
Financial Sector Conduct Authority (FSCA)	is the market conduct regulator of financial institutions that provide financial products and services, financial institutions licensed in terms of a financial sector law, including banks, insurers, retirement funds and administrators, and market infrastructures.
Insurer	means the insurance company that underwrites this insurance, namely Guardrisk Life Limited (registration number 1999/013922/06 and FSP number 76), an authorised Financial Services Provider and an Insurer licensed to conduct life insurance business in terms of the Insurance Act 18 of 2017 and the Long-term Insurance Act 52 of 1998.
Intermediary Services	<p>means any act other than the furnishing of advice performed by a person for or on behalf of a customer or product supplier—</p> <ol style="list-style-type: none"> a) the result of which is that a customer may enter into, offers to enter into or enters into any transaction in b) respect of a financial product with a product supplier; or c) with a view to: <ul style="list-style-type: none"> • buying, selling, or otherwise dealing in (whether on a discretionary or non-discretionary basis), • managing, administering, keeping in safe custody, maintaining or servicing a financial product • purchased by a customer from a product supplier or in which the customer has invested; • collecting or accounting for premiums or other money payable by the customer to a product supplier • in respect of a financial product; or • receiving, submitting, or processing the claims of a customer against a product supplier.
Key Individual	means specifically, within the insurance industry, a manager of the insurance department within a financial services provider. As such, this individual oversees the operations, compliance, and performance of the insurance department, ensuring that all activities within the department adhere to the relevant legislative and regulatory requirements outlined by FAIS and other applicable laws. A Key Individual, as defined by FAIS legislation and the General Code of Conduct, is a designated individual within a financial services provider who holds a key position of authority and responsibility, including the management of specific departments such as the insurance department, and who is registered with the regulatory authority to ensure compliance with applicable laws and regulations.
Representative	<p>means an individual that a financial services provider authorises to act on their behalf to render financial services to customers. This authorisation is granted under the licensing framework established by the FSCA in South Africa.</p> <p>Critical aspects of a representative in the insurance industry include:</p> <ul style="list-style-type: none"> ○ Registered Under FSCA License: Representatives are required to register under the license of the financial services provider they represent. The FSCA oversees this registration, ensuring that representatives meet the necessary qualifications and comply with regulatory requirements. ○ Ability to Give Advice: Representatives are authorised to provide advice on financial products and services within the scope of their license and the regulatory framework. This advice may

	<p>include recommendations on insurance products, coverage options, and financial planning strategies tailored to the Customer's needs.</p> <ul style="list-style-type: none"> ○ Acting on Behalf of Financial Services Provider: Representatives act as intermediaries between Customers and the financial services provider they represent. They facilitate the sale and servicing of insurance products, handle Customer inquiries, and assist in the claims process, among other responsibilities. ○ Compliance with the FAIS Act and General Code of Conduct: Representatives must adhere to the provisions outlined in the FAIS Act and the General Code of Conduct. This includes maintaining the necessary competence, conducting business with integrity, disclosing relevant information to Customers, and ensuring their advice suits the Customer's circumstances. <p>In summary, a representative in the insurance industry, as defined by the FAIS Act and the General Code of Conduct, is an individual registered under the license of a financial services provider, authorised to provide advice on insurance products and services, and responsible for acting in compliance with regulatory requirements while serving the interests of Customers.</p>
<p>Representative under supervision</p>	<p>means an individual authorised by a licensed financial services provider (Barko) to render financial services to customers under the direct supervision of a qualified and experienced Key Individual. This concept is defined within the FAIS Act and the General Code of Conduct, which regulate the conduct of financial services providers and their representatives in South Africa. Critical aspects of a representative under supervision in the insurance industry include:</p> <ul style="list-style-type: none"> ○ Limited Authorisation: Representatives under supervision are granted limited authorisation to provide specific financial services, such as advising on insurance products, processing transactions, and handling Customer inquiries. However, they must operate under the direct supervision of a qualified Key Individual appointed by the financial services provider. ○ Supervision Requirement: Representatives under supervision must work closely with their designated supervisor, who oversees and guides their activities. The supervisor monitors the representatives' customer interactions, reviews their advice and recommendations, and ensures compliance with regulatory requirements and internal policies. ○ Training and Development: Representatives under supervision typically undergo training and development programs to enhance their knowledge and skills in the insurance industry. These programs may include formal education, on-the-job training, mentoring, and ongoing assessment to ensure competency in providing financial services. ○ Compliance Obligations: Representatives under supervision are subject to the same compliance obligations as fully authorised representatives under the FAIS Act and the General Code of Conduct. This includes maintaining integrity, disclosing relevant information to

	<p>Customers, ensuring the suitability of advice, and adhering to regulatory requirements and industry standards.</p> <ul style="list-style-type: none"> ○ Gradual Transition to Full Authorisation: The status of "representative under supervision" is temporary, and individuals in this role are expected to work towards obtaining full authorisation as independent representatives. This may involve completing additional qualifications, gaining practical experience, and demonstrating proficiency in providing financial services. <p>In summary, a representative under supervision in the insurance industry, as defined by the FAIS Act and the General Code of Conduct, is an individual authorised to provide limited financial services under the direct supervision of a qualified Key Individual or Compliance Officer. They undergo training, adhere to compliance obligations, and work towards obtaining full authorisation as independent representatives.</p>
Internal TCF Officer	A dedicated Barko department or team oversees and ensures compliance with TCF principles and outcomes. This office is tasked with developing, implementing, and monitoring policies, procedures, and practices that prioritise fair treatment of customers through all stages of their interaction with Barko. The internal TCF office works to embed a customer-centric culture within Barko, conducts regular assessments and audits to evaluate TCF compliance, addresses customer complaints and feedback, and provides training and support to Employees to uphold TCF standards.
Culture	refers to the collective values, beliefs, attitudes, and behaviours that shape the organisational environment and guide customer interactions. A TCF culture emphasises fairness, transparency, integrity, and customer-centricity in Barko's operations. It fosters an environment where employees prioritise customers' best interests, strive to understand their needs, communicate clearly and honestly, and consistently deliver products and services that meet or exceed customer expectations. A strong TCF culture is characterised by a commitment to continuous improvement, accountability, and ethical conduct, ensuring that fair treatment of customers is ingrained in Barko's identity and reflected in every interaction with customers.
TCF Outcomes	<p>means the following outcomes:</p> <ol style="list-style-type: none"> 1. Outcome 1 Culture and Governance 2. Outcome 2 Products and Services Suitability 3. Outcome 3 Communication/Disclosures 4. Outcome 4 Suitable Advice 5. Outcome 5 Product Performance and Service Expectations 6. Outcome 6 No unreasonable post-sale barriers

2. Introduction

Our Treating Customers Fairly (TCF) policy embodies an outcomes-based regulatory and supervisory approach, mandated to ensure that our institution delivers specific, clearly defined fairness outcomes for our financial customers. As a regulated entity, we adhere to the 6 (six) TCF outcomes throughout the product life cycle, encompassing product design, promotion, advice, servicing, complaints, and claims handling.

These 6 (six) outcomes include:

9.1 Outcome 1: Culture and Governance:

Our customers can trust that fair treatment is fundamental to our corporate ethos. We foster a company culture where fair treatment of customers is a core value, ensuring every employee upholds fairness in all interactions.

9.2 Outcome 2:

Products and Services Suitability:

Our products are designed and marketed to meet the needs of specific customer groups, ensuring alignment with customer expectations. Customers receive transparent and timely **factual information** throughout their purchasing journey.

9.3 Outcome 3:

Communication/Disclosures:

We ensure customers receive clear, transparent, and timely information throughout their engagement.

9.4 Outcome 4:

Suitable Advice:

Our advice is tailored to each customer's individual circumstances, providing recommendations that meet their specific needs.

9.5 Outcome 5:

Product Performance and Service Expectations:

Products and services meet customer expectations in terms of performance and quality.

9.6 Outcome 6:

No unreasonable post-sale barriers:

Customers encounter no unreasonable obstacles when seeking to change products, switch providers, file claims, or lodge complaints.

Through this policy, we affirm our dedication to upholding the principles of fairness and transparency in all our interactions with customers. Barko welcomes the TCF initiative and commits itself to align the organisational culture and business processes to ensure that the 6 (six) outcomes of TCF are always achieved.

3. The Internal TCF Officer

The Internal TCF Officer plays a pivotal role within Barko, embodying our commitment to treating customers fairly. The appointed officer, M. Ruthven, serves as Barko's Internal TCF Officer with the following responsibilities:

- Fostering a culture where fair treatment of customers is paramount by embedding TCF Principles.
- Assisting in **implementing and adopting** business processes to ensure continuous achievement of TCF outcomes.
- Regularly **communicate TCF outcomes and achievements to management and Employees through internal channels.**
- Demonstrating TCF principles in her work and possessing comprehensive knowledge of Barko's operations to advise Management and Employees on TCF integration.
- Conducting annual TCF training to ensure all Employees understand this policy and fulfill TCF requirements.
- Evaluating customer complaints, claims, and retention against internal processes, adjusting policies and procedures to enhance service delivery.
- Ensure the policy is regularly reviewed, updated, and submitted to the board for approval.

4. **Outcome 1 – Culture and Governance**

Customers can trust that fair treatment is a core of Barko's culture.

4.1 Objective

Our primary objective is to instill confidence in all our customers or potential customers by ensuring they are dealing with a company where fair treatment is central to our corporate culture. We strive to consistently deliver financial services with honesty, fairness, skill, care, and diligence, always acting in the customers' best interests and maintaining the integrity of the financial services industry. The delivery of TCF outcomes aligns with Barko's core values, the **General Code of Conduct**, and the **Duty of Care Policy (Annexure "A")**.

4.2 Procedures Implemented to achieve the objective

- TCF is a recurring agenda item in our monthly management and employee meetings, where we analyse and discuss our approach to TCF within Barko.
- Management, including Key Individuals (KIs), have embraced TCF deliverables and have been assigned specific responsibilities accordingly.
- Management regularly reviews our primary business processes to identify areas that may require improved TCF deliverables. Strategic planning processes for new strategies or changes to existing ones explicitly consider TCF implications and deliverables.
- Adherence to TCF deliverables is monitored as part of our Compliance Programme. Quarterly assessments ensure the production of accurate, meaningful, and timely Management Information, with corresponding management actions taken.
- All requests for product and service innovations or project expenditures, undergo due consideration of their potential impact on TCF outcomes.
- Accessible structures have been established for employees and management to discuss TCF-related matters and address any questions or concerns.
- Oversight and monitoring of TCF delivery are integrated into Barko's governance and control structures, overseen by dedicated risk management and compliance functions. Formal and regular reporting to management covers TCF risks or failures, and progress towards achieving TCF deliverables across all Barko's activities and divisions.
- The management of TCF and market conduct risks is formally incorporated into our risk management framework, and the Compliance Officer monitors and reviews it on a continuous basis.
- Mechanisms are in place to monitor and respond to changes in the broader environment, including economic and regulatory developments, to proactively identify TCF-related risks.

4.3 Employee Participation

- Performance evaluation criteria include TCF objectives, and are consistently applied across all organisational levels.
- Employees receive training on TCF principles and deliverables, to enhance their understanding and implementation.
- Recruitment processes are revised to ensure that employees in relevant positions possess the necessary skills to achieve TCF outcomes.
- All employees are briefed on the requirement to treat customers fairly. This policy is disseminated to all employees, who are encouraged to provide suggestions to our Internal TCF Officer on enhancing customer treatment.
- Employment and service agreements are updated to allow for meaningful consequences, such as retraining, reassignment, or disciplinary action, as appropriate, for employees or management who fail to meet agreed TCF deliverables.

4.4 Management Information and internal communication

- Existing management information measures have undergone review, to assess their relevance for TCF monitoring, with new measures identified as needed (**Annexure "C"**).
- Processes are established to collect and summarise TCF-related management information, ensuring a comprehensive overview of TCF progress.
- Analytical procedures are in place, to interpret and respond to management information findings, facilitating enhancements in TCF outcomes for our customers.
- Management information findings inform the identification of employees' training needs and align with performance management measures.
- Transparent communication with stakeholders, including regulatory bodies, regarding our progress in achieving TCF outcomes is maintained.
- Information on our progress in achieving TCF outcomes is readily accessible and disseminated.

5. **Outcome 2 – Products and Services Suitability**

Our products and services marketed and sold in the retail market are meticulously crafted to cater to the specific needs of identified customer groups, ensuring precise targeting and alignment with their requirements.

5.1 Objective

Our objective is to develop (where applicable) or select and provide advice and certain intermediary / administrative services, on financial products falling within the categories and sub-categories listed in **Annexure "B"**. Our rigorous product approval and selection processes, designed to ensure that each product adequately addresses the needs of identified customer groups and individual customers, aligns with TCF outcomes, and meets customer expectations in terms of performance.

5.2 Procedures implemented to achieve the objective

To ensure our products and services are tailored to meet the diverse needs of our customers, we categorise our customers into 2 (two) main groups:

- *Low sophistication:*
Individuals with limited experience and a high reliance on guidance.
- *Moderate sophistication:*
General customers within the mass market.

Our product approval and selection processes involve thorough consideration of the following factors:

- Identifying suitable customer groups when designing or selecting products.
- Obtaining information from suppliers regarding the intended customer groups for each product.
- Guiding Employees to match products with appropriate customer groups.
- Assessing distribution and administration methods for compatibility with the product and target market, considering associated risks.
- Implementing measures to identify and mitigate risks specific to certain customer groups.
- Evaluating promotional materials and optional products/services to ensure suitability for the identified customer groups.
- Ensuring fair treatment in providing bundled or "add-on" products/services, targeting them appropriately.
- Assessing customer's financial understanding of offered products/services.
- Monitoring sales to confirm alignment with identified customer groups.

- Establishing processes to address instances where products or distribution methods prove unsuitable for specific customer groups.

These measures aim to customise our offerings to match each customer group's unique requirements and mitigate risks associated with product distribution and administration.

5.3 Employee Participation

Our employees are pivotal in selling products to our customer base.

Employees must adhere to the following guidelines:

- Selling Based on Factual Information:
Employees must sell products to customers solely based on factual information shared at the branch level. This ensures transparency and accuracy in all customer interactions.
- Referral for Advice and Intermediary Services:
Should a customer require advice and/or intermediary services (claims, queries regarding premium payments, etc.) on any products, employees are required to refer the customer to the insurance department for assistance. This ensures customers receive personalised advice and intermediary services tailored to their needs and circumstances.

Additionally, employees at the branch level are encouraged to consult with their direct managers regarding Customer base needs. Managers will collaborate with employees to identify customers' needs, and develop products that meet these needs and align with TCF objectives. By following these protocols, our employees actively contribute to the fair treatment of our customers, and support the development of products that cater to their unique requirements.

5.4 Management information and internal communications

The following practices are implemented to facilitate transparent communication and ensure alignment with TCF objectives:

- *Customers and Branch Employee Communication:*
Open communication channels between customers and branch employees to exchange factual information regarding products and services. Branch employees are trained to provide customers with accurate information and address any queries or concerns.
- *Referral of Advice and/or Intermediary Services Requests:*
When customers require personalised advice, and / or intermediary services on products, branch employees must refer them to the insurance department for assistance. This ensures customers receive tailored advice and/or intermediary services that meet their needs and align with TCF principles.
- *Internal Communication with Management:*
Branch employees regularly communicate customer feedback and needs to management. This information is crucial for identifying areas where products can be improved or developed to meet customers' needs better. Management collaborates with branch employees to develop strategies for product enhancement that align with TCF objectives.
- *Compliance Monitoring:*
Management oversees compliance with TCF principles and monitors internal processes to ensure adherence to regulatory requirements. Regular audits and reviews by the Internal

Audit Department and the Operations Department assess the effectiveness of internal communication channels in supporting TCF objectives.

Implementing these practices will enhance customer, branch employees, and management communication. This will ultimately improve the design and delivery of products and services to meet our customers' diverse needs while upholding TCF principles.

6. **Outcome 3 – Communication/Disclosures**

Customers receive transparent and timely information throughout their engagement, ensuring they are adequately informed before, during, and after the point of sale.

6.1 Objective

Our objective is to establish comprehensive processes that guarantee the provision of relevant, sufficient, and transparent product and financial information to our customers before and during the point of sale. This information, disseminated by our **employees**/representatives or other parties, will be delivered appropriately to empower customers to make informed decisions regarding contract engagement. Additionally, our annual **review** process ensures that all customers remain informed after the point of sale, particularly regarding any product or financial changes.

6.2 Procedures implemented to achieve the objective:

- *Assessment of Product Information:*
We evaluate the clarity, appropriateness, and fairness of product information provided to customers, ensuring that all product-related information receives management sign-off, regardless of its source. The Insurer also approves our product information.
- *Product Transparency:*
We provide customers with easily understandable, concise summaries of key terms, product features, and risks associated with each product.
- *Testing of Information:*
Before dissemination, all product information undergoes meticulous testing to ensure it is clear and understandable to the intended audience and customer group.
- *Risk Mitigation Procedures:*
We have established risk mitigation procedures to address any inaccurate, unfair, or misleading information about our products or services provided by third parties.
- *Accuracy of Information:*
Procedures are in place to ensure that any information we provide about other parties' products or services is accurate, transparent, fair, and not misleading.
- *Rectification Procedures:*
We have implemented protocols to promptly rectify any instances where existing product information is found to be inaccurate, unclear, unfair, or misleading.
- *Review of Standardised Information:*
Standardised product information is regularly reviewed to ensure accuracy, clarity, and appropriateness for applicable customer groups.

- *Feedback Monitoring:*
We actively monitor and respond to feedback, complaints, and suggestions from customers, employees, and other parties to improve product information.
- *Record of Advice (where applicable):*
A documented Record of Advice is maintained for each customer transaction, and a copy is emailed to the customer upon completion of the transaction.
- *Communication of Changes:*
Customers are promptly informed [at least 31 (thirty-one) days' notice] of any recent or pending changes to products, contractual events, or required actions, allowing them sufficient time to respond or act.
- *Control of Information Accuracy:*
We oversee the accuracy and quality of once-off or non-standard product information provided by employees or representatives to customers.
- *Maintenance of Customer Contact Details:*
We keep up-to-date contact details for all existing customers.
- *Accessible Contact Points:*
Customers can access current and accessible contact points for product or service inquiries or contact the customer care/insurance departments.
- *Changes to Products and Services:*
When significant changes to products or services occur, customers receive clear, upfront information about the implications, providing ample time to make informed decisions.
- *Complaint Process:*
Our complaints procedure is readily available, and we ensure that customers are informed about how to lodge complaints and what to expect during the resolution process.
- *Recordkeeping:*
Accurate, retrievable, and secure records of all product information provided to customers and interactions with customers are maintained.

6.3 Employee Participation

The employees play a vital role in ensuring that customers are provided with clear information and kept appropriately informed throughout their interactions with our products and services. The following guidelines are established for employee participation:

- *Product Information Dissemination:*
Employees are responsible for disseminating clear and accurate product information to customers before, during, and after the point of sale, ensuring transparency and comprehension.
- *Compliance with Procedures:*
Employees must adhere to established procedures for evaluating, testing, and rectifying product information to ensure its clarity, appropriateness, and fairness.

- *Customer Feedback Handling:*
Employees are encouraged to actively monitor and respond to customer feedback, complaints, and suggestions regarding product information, facilitating continuous improvement in communication practices.
- *Communication of Changes:*
Employees play a crucial role in promptly communicating any changes to products, contractual events, or required actions to customers, enabling them to respond or act accordingly.
- *Recordkeeping and Documentation:*
Employees must maintain accurate and secure records of all product information provided to customers and interactions with customers, ensuring compliance with regulatory requirements.

By actively disseminating clear and accurate product information and engaging with customer feedback, employees contribute to achieving Outcome 3 and demonstrate our commitment to treating customers fairly.

6.4 Management information and internal communications

Adequate management information and internal communication practices are essential for ensuring that customers are provided with clear information and kept appropriately informed throughout their engagement with our products and services.

The following procedures are implemented to facilitate transparent communication and adherence to TCF principles:

- *Assessment of Product Information:*
Management conducts regular assessments to evaluate the clarity, appropriateness, and fairness of product information provided to customers, incorporating feedback from internal stakeholders and customers.
- *Testing and Approval Procedures:*
Before dissemination, all product information undergoes rigorous testing, to ensure clarity and comprehensibility, with final approval required from management to ensure alignment with TCF objectives.
- *Risk Mitigation Protocols:*
Management oversees the implementation of risk mitigation procedures to address any instances of inaccurate, unfair, or misleading product information, prioritising the protection of customer interests.
- *Feedback Monitoring:*
Management actively monitors and responds to feedback, complaints, and suggestions from customers and internal stakeholders regarding product information, facilitating continuous improvement in communication practices.
- *Communication of Changes:*
Management ensures that any changes to products, contractual events, or required actions are promptly communicated to customers and employees, enabling timely responses and actions by TCF principles.

- *Recordkeeping and Documentation:*
Management maintains accurate and retrievable records of all product information provided to customers and interactions with customers, ensuring compliance with regulatory requirements and facilitating transparency and accountability.

By implementing these procedures and fostering transparent communication practices, management demonstrates its commitment to achieving Outcome 3 of the TCF policy, promoting fair treatment of customers and enhancing the overall customer experience.

7. Outcome 4 – Suitable Advice

When providing advice (where required) to customers, the advice is tailored to be suitable and considers each customer's individual circumstances.

7.1 Objective,

Our objective is to establish comprehensive processes and procedures, that ensure adherence to the advice process outlined in our documented advice process and duty of care (Ethics) document (**Annexure “A” and “D”**). This requirement applies to management and all employees, who must sign the document as acknowledgment, with copies retained for recordkeeping purposes. This established process guarantees that customers receive suitable advice considering their needs and circumstances.

7.2 Procedures Implemented in order to achieve objective

- *Authorisation and Due Diligence:*
Prior to marketing any product, we assess our authorisation status, skills, and business processes to ensure suitability for the target market. We conduct due diligence on product suppliers, to verify their authorisation and assess their products and service levels.
- *Training and Controls:*
We require product suppliers to provide adequate training to our representatives on marketed products. Controls are in place to prevent representatives from offering services for products without adequate training.
- *Access to Information:*
We arrange for reasonable access to product information from suppliers, to enable suitable financial services to customers and potential customers.
- *Customer Information and Needs or Suitability Analysis:*
Representatives gather relevant information about customers' financial situations, product experience, and objectives. Based on this information, an analysis is conducted to identify appropriate financial products and ensure customers understand the advice given.
- *Customer replacement policies:*
Funeral - The policy is not designed to replace an existing policy. If the consumer is considering replacing an existing policy with the Barko Funeral policy, it is essential to consult their broker beforehand.
- *Customer replacement policies:*
Credit Life - The Credit Life Policy is a mandatory product and may be replaced with a similar policy that provides sufficient cover.

- *Risk Identification and Mitigation:*
We identify and address risks of inappropriate financial services and monitor feedback and complaints to mitigate risks and ensure customer satisfaction.
- *TCF Indicators Monitoring:*
We monitor TCF indicators such as insurance claims, product retention, and frequency of product changes, to identify and address risks of inappropriate financial services.
- *Feedback to Suppliers:*
We provide feedback to product suppliers on any aspects of their products or services that hinder our ability to provide helpful advice or achieve TCF outcomes.
- *Conflict of Interest Management:*
Controls are in place to identify and address conflicts of interest between ourselves, customers, and product suppliers.
- *TCF Measures and Agreements:*
Clear TCF measures are included in representative criteria and agreements, with product suppliers outlining responsibilities for providing appropriate financial services and customer support.
- *Compliance Monitoring:*
We monitor representatives' compliance with authorisation and contract mandates, FAIS license conditions, and legal requirements to prevent unauthorised advice provision.
- *Regulatory Compliance:*
We stay informed of FAIS Ombud decisions, regulator communications, and other relevant information to ensure our practices remain compliant and effective in achieving TCF outcomes.
- *Escalation Protocol:*
If the communication department's assistance is inadequate, the matter is escalated to the insurance department, legal and compliance officer, insurance manager, and finally, to the insurer for resolution.

By implementing these procedures, we ensure that customers receive suitable advice and that their specific circumstances have been considered, contributing to the achievement of Outcome 4 in our TCF policy.

7.3 Employee Participation

Employees play a crucial role in ensuring that customer advice is suitable and considers their circumstances.

The following guidelines outline employee participation in achieving this outcome:

- *Adherence to Procedures:*
Employees are required to adhere to documented advice processes and duty of care (Ethics) guidelines (Annexure "A") to ensure that the advice provided is in line with TCF principles and regulatory requirements.

- *Customer Information Gathering:*
Employees must take reasonable steps to gather relevant customer information regarding their financial situation, product experience, and objectives to provide helpful advice.
- *Analysis and Identification:*
Employees are responsible for conducting thorough needs and suitability analyses, based on customer information, to identify financial products suitable for the customer's risk profile and financial needs.
- *Communication and Understanding:*
Employees must communicate advice clearly to customers, ensuring they understand the advice provided, and are in a position to make informed decisions.
- *Escalation Protocol:*
If designated employees in the communications department are unable to assist with customer inquiries or concerns, the matter is escalated to the insurance department for appropriate advice. If further assistance is required, the matter is escalated to the legal and compliance officer, insurance manager, and ultimately to the insurer for resolution.
- *Feedback and Improvement:*
Employees are encouraged to monitor feedback and complaints regarding advice practices, and contribute to continuous improvement initiatives to enhance the quality of advice provided to customers.

By actively participating in the provision of suitable advice and adhering to the outlined escalation protocol, employees contribute to achieving Outcome 4 in our TCF policy and demonstrate our commitment to treating customers fairly.

7.4 Management information and internal communications

Effective management information and internal communication practices are essential for ensuring that customer advice is suitable and considers their individual circumstances.

The following procedures are implemented to facilitate transparent communication and adherence to TCF principles:

- *Assessment of Advice Processes:*
Management conducts regular assessments to evaluate the effectiveness of documented advice processes and duty of care (Ethics) guidelines (Annexure "A") in ensuring that the advice provided is suitable and aligned with TCF principles.
- *Feedback Monitoring:*
Management actively monitors feedback and complaints regarding advice practices from internal stakeholders and customers, facilitating continuous improvement in communication practices and the quality of advice.
- *Escalation Protocol Communication:*
Management ensures that employees are aware of the escalation protocol for customer inquiries or concerns regarding advice. Clear communication channels are established to facilitate the escalation process to the communications department, insurance department, legal and compliance officer, insurance manager, and insurer as needed.

- **Training and Development:**
Management provides ongoing training and development opportunities to employees involved in providing advice, ensuring they are equipped with the necessary skills and knowledge to deliver suitable advice, that considers individual customer circumstances.
- **Recordkeeping and Documentation:**
Management maintains accurate and retrievable records of advice (where required) provided to customers and interactions with customers, ensuring compliance with regulatory requirements, and facilitating transparency and accountability.
- **Communication of Changes:**
Management promptly communicates any changes to advice processes, duty of care guidelines, or regulatory requirements to employees, ensuring they are kept informed and able to adjust their practices accordingly.
- **Compliance Monitoring:**
Management monitors employee compliance with documented advice processes and duty of care guidelines, taking corrective action as needed to address any deviations, and ensure adherence to TCF principles.

By implementing these procedures and fostering transparent communication practices, management demonstrates its commitment to achieving Outcome 4 of the TCF policy. This will promote the fair treatment of customers and enhance the overall quality of advice.

8. Outcome 5 – Product Performance and Service Expectations **Customers receive products that meet their expectations as communicated by Barko, and the associated service meets an acceptable standard in line with their expectations.**

8.1 Objective

Our objective is to establish robust processes and procedures that mitigate the risk of products and services failing to meet customers' reasonable expectations.

8.2 Procedures implemented in order to achieve objective

To ensure that products and services meet or exceed the reasonable expectations of our customers, the following procedures are implemented:

8.2.1 For Internal Operations:

- **Analysis of Customer Behaviour:**
We analyse customer behaviours, including product retention, claims, cancellations, and complaints, to identify instances where products or services may not meet expectations.
- **Customer Alerts:**
Processes are in place to promptly alert customers to any risks associated with their actions or inaction, such as cancellations, non-payment, or failure to review insurance cover needs.
- **Service Standards:**
Clear service standards are established and communicated to customers to ensure transparency and alignment with their expectations.

- *Research and Testing:*
We regularly research and test our service standards to ensure they meet or exceed customer expectations.
- *Feedback Monitoring:*
We monitor and act on feedback, complaints, and suggestions from customers, intermediaries, and employees to identify areas for improvement in our services.
- *Risk Mitigation:*
Processes are implemented to mitigate customer risks if products are not performing as expected.
- *Management Information:*
We utilise management information to gain insights into customer expectations and preferences.
- *Customer Confidentiality:*
Processes are in place to protect the confidentiality of all customer information.

8.2.2 For Third Parties:

- *Clear Agreements:*
Clear agreements are established between us and third parties regarding the division of responsibilities to ensure fair treatment of customers.
- *Due Diligence:*
We conduct due diligence on third parties to ensure adherence to TCF outcomes and service levels as customers expect.
- *Monitoring Standards:*
We regularly monitor third parties' customer treatment standards to ensure alignment with customer expectations.
- *Risk Mitigation:*
Processes are in place to mitigate customer risks if third-party products or services do not meet agreed-upon standards.
- *Information Access:*
We have full access to information held by third parties related to our customers' management information.

By implementing these procedures, we aim to ensure that our products and services consistently meet or exceed our customers' reasonable expectations, fulfilling Outcome 5 of our Treating Customers Fairly policy.

8.3 **Employee Participation**

Employees play a crucial role in ensuring that our products and services meet or exceed the reasonable expectations of our customers.

To achieve this, employees are actively involved in the following ways:

- *Adherence to Standards:*

All employees are required to adhere to the established service standards and procedures, to ensure that products and services align with customer expectations.

- *Feedback Mechanism:*
Employees are encouraged to provide feedback on customer interactions and product performance, to identify areas for improvement. This feedback is essential in refining our offerings to meet customer expectations better.
- *Training and Development:*
Regular training sessions are conducted to equip employees with the necessary skills and knowledge, to deliver products and services that meet customer expectations. This includes training on understanding customer needs and how to address them effectively.
- *Communication Channels:*
Employees are provided with clear communication channels to escalate concerns or issues regarding product performance or customer feedback. This ensures that any discrepancies are addressed promptly and appropriately.
- *Continuous Improvement:*
Employees are encouraged to actively participate in initiatives to improve product performance and service delivery. This could involve brainstorming sessions or team meetings, to discuss innovative ideas and solutions.

By actively involving employees in the process, we ensure that our products and services consistently meet or exceed the reasonable expectations of our customers, thereby upholding Outcome 5 of our TCF policy.

8.4 **Management information and internal communications**

Effective management information and internal communications are vital to ensure that products and services consistently meet or exceed the reasonable expectations of our customers.

To achieve this, the following measures are implemented:

- *Data Analysis:*
Regular customer behaviour analysis, including product retention, complaints, and feedback, is conducted to identify trends or patterns indicating potential gaps in product performance or service delivery.
- *Reporting Mechanisms:*
Clear reporting mechanisms are established to communicate findings from data analysis to relevant stakeholders, including management, product development teams, and customer service representatives.
- *Internal Communication Channels:*
Dedicated internal communication channels, such as team meetings, newsletters, and digital platforms, are utilised to disseminate information regarding product performance, customer feedback, and any necessary improvements or updates.

- *Training and Development:*
Management ensures that employees are adequately trained and informed about any changes or updates related to product performance or service standards. This includes regularly updating customer expectations and best practices for meeting them.
- *Feedback Loops:*
Mechanisms are in place to facilitate feedback loops between different departments, such as product development, customer service, and sales teams, to ensure that insights from customer interactions are shared and used to improve products and services.
- *Performance Monitoring:*
Key performance indicators related to product performance and customer satisfaction are monitored regularly, and the findings are communicated to relevant stakeholders to drive continuous improvement efforts.
- *Compliance Reporting:*
Compliance officers ensure that all internal communications and management information adhere to regulatory requirements, and Barco policies promote transparency and accountability in addressing customer expectations.

By implementing robust management information and internal communications practices, we aim to foster a culture of transparency, collaboration, and continuous improvement to ensure that our products and services consistently meet or exceed the reasonable expectations of our customers, as outlined in Outcome 5 of our Treating Customers Fairly policy.

9. **Outcome 6 - No unreasonable post-sale barriers, changes, complaints and claims**

Customers encounter no unjustifiable obstacles imposed by companies when seeking to alter products, switch providers, file claims, or lodge complaints after a sale.

9.1 **Objective**

We aim to establish sufficient processes and protocols to prevent customers from encountering unreasonable obstacles after a sale when seeking to modify a product, switch providers, lodge a claim, or file a complaint.

9.2 **Procedures Implemented to Achieve Objective**

9.2.1 Changing Products:

- Customers are informed proactively about allowable changes to their products and any limitations on accessing funds or making amendments.
- We promptly inform customers of potential product changes to address their evolving needs or circumstances (for example, affordability difficulties).
- Clear service standards are established and communicated to customers regarding the processing of product changes.
- If a request for a product change is declined, the customer is provided with clear reasons for the decision.
- Customers are promptly notified of any potential risks associated with requested product changes.
- For example, if a customer requests to switch from one of our funeral insurance products to another after a year of premium payments. Instead of complicating the process, our Insurance Department provides clear, step-by-step guidance on transferring without penalty, ensuring the customer faces no unnecessary

delays. They are given a detailed explanation and alternative options if their request is declined.

9.2.2 Switching Providers:

- Transparent service standards are established and communicated to customers to process switches to other providers.
- Customers are informed of any potential risks associated with switching providers upon receiving a request.

9.2.3 Claims and Disbursement Handling:

- Claims and disbursement handling processes are thoroughly tested to ensure suitability for the product and target customer group.
- Customers are informed upfront about the process and information required to submit a claim or disbursement request.
- Clear service standards are communicated to customers regarding claims and disbursement processing.
- Customers are informed before contracting about circumstances where claims or disbursement requests may not be processed.
- Customers are informed of progress throughout the claims process via a documented process.
- In the case of claim repudiation or disbursement request declination, clear reasons are provided to the customer, along with steps for review if applicable.
- Decisions regarding claims or disbursement requests consider customers' reasonable benefit expectations and TCF objectives.
- Claims and disbursement processing: employees receive specific training on TCF principles.
- Claims repudiation experience and claims handling quality of different insurers are considered when recommending an insurer to customers.
- Analysis of claim types and claim repudiation experience is conducted to identify miss-selling risks.

9.2.4 Complaints Handling:

- Complaints processes are rigorously tested to ensure accessibility and appropriateness for our customer groups.
- A robust complaints management, record-keeping, and root cause analysis process is in place.
- Customers are informed beforehand about the complaint submission process and available recourse options.
- Progress updates on complaints are provided to customers, along with contact details of responsible personnel.
- Responses to complaints include clear reasons with supporting evidence, fostering transparency.
- If a request for redress is declined, customers are informed about potential steps for review.
- Service standards for processing complaints are established and communicated to customers.
- Employees receive specific training for complaints handling to ensure consistency and objectivity.
- Compensation procedures are outlined to address any identified unfair treatment resulting in financial prejudice.

- Processes are structured to ensure conflict-free decision-making and consistent complaints handling.
- Customer satisfaction levels are assessed through follow-up processes on finalised complaints.
- Complaint analysis is conducted to identify miss-selling risks.
- Complaints handling performance of different product suppliers determines business and product recommendations to customers.

9.2.5 Dedicated Post-Sale Support Department (Communications Department):

- To ensure a seamless post-sale experience, Barko has established a dedicated customer support department, the Communications Department, which is trained specifically in TCF principles.

This Department is responsible for:

- *Handling post-sale queries:*
The team assists customers with product modifications, claims submissions, and complaint escalations, ensuring smooth and transparent post-sale interactions.
- *Proactively mitigating issues:*
The team engages with customers to resolve potential issues before they escalate, offering guidance on product changes and addressing concerns with prompt, fair resolutions.
- *Tracking post-sale performance:*
Post-sale interactions are regularly monitored to ensure that service standards are upheld and that customers receive consistent, high-quality support in line with TCF objectives.

9.3 Employee Participation

9.3.1 Training and Awareness:

- All employees are trained on Barko's policies and procedures related to product changes, switching providers, claims handling, and complaints management.
- Regular training sessions ensure employees understand their roles and responsibilities in facilitating customer requests and addressing post-sale barriers.

9.3.2 Clear Communication Channels:

- Employees are provided with clear communication channels to escalate customer requests for product changes, provider switches, claim submissions, or complaints.
- Employees are encouraged to communicate promptly with relevant departments or individuals to facilitate customer requests without unreasonable delays.

9.3.3 Proactive Customer Support:

- Employees actively engage with customers to identify any potential post-sale barriers they may face and offer assistance in navigating through the process.
- Employees are trained to provide customers with clear, factual and transparent information regarding their options and any associated risks or limitations.

- 9.3.4 Compliance and Adherence:
- Employees are required to adhere to established service standards and procedures for processing customer requests, ensuring compliance with regulatory requirements.
 - Regular monitoring and supervision are conducted to ensure employees follow prescribed protocols and maintain high service delivery standards.
- 9.3.5 Feedback and Improvement:
- Employees are encouraged to provide feedback on existing processes, and suggest improvements to enhance customer experience and streamline post-sale services.
 - Management solicits input from employees on ways to mitigate post-sale barriers and improve efficiency in handling customer requests.
- 9.3.6 Continuous Learning:
- Employees participate in ongoing learning and development activities to stay updated on industry trends, regulatory changes, and best practices related to post-sale services.
 - Feedback from employees is incorporated into training programs to address any identified gaps in knowledge or skills related to Outcome 6 objectives.

9.4 Management information and internal communications

- 9.4.1 Reporting and Monitoring:
- Management establishes comprehensive reporting mechanisms to track and monitor post-sale barriers faced by customers, including instances of product changes, provider switches, claim submissions, and complaints.
 - Regular management reports are generated to analyse trends, identify recurring issues, and assess the effectiveness of existing processes in addressing post-sale barriers.
- 9.4.2 Internal Communication Channels:
- Clear and effective communication channels are established within Barko to facilitate the timely sharing of information related to post-sale services.
 - Departments responsible for handling product changes, provider switches, claims, and complaints collaborate closely to ensure seamless coordination and resolution of customer requests.
- 9.4.3 Escalation Protocols:
- Defined escalation protocols are established to address complex or unresolved customer issues related to post-sale barriers.
 - Employees are provided with guidelines on when and how to escalate customer concerns to higher management levels or specialised departments for prompt resolution.
- 9.4.4 Compliance Oversight:
- Management oversees compliance with regulatory requirements and internal policies governing post-sale services, ensuring that all actions taken are in accordance with applicable laws and industry standards.
 - Regular audits and reviews are conducted to assess compliance levels and identify areas for improvement in addressing post-sale barriers.

9.4.5 Customer Feedback Integration:

- Management incorporates customer feedback into internal communications channels to gain insights into their experiences with post-sale services.
- Feedback mechanisms are utilised to gather customer suggestions and complaints, which are then communicated internally for review and action as necessary.

9.4.6 Training and Education:

- Management provides ongoing training and education opportunities for employees involved in post-sale services to enhance their knowledge and skills.
- Internal communication platforms are used to disseminate updates on new processes, procedures, and regulatory changes relevant to effectively addressing post-sale barriers.

10. Non-Compliance

In the event of non-compliance with the TCF principles and outcomes outlined in this agreement, the following actions may be taken:

- *Negotiation for Corrective Action:*
The FSCA reserves the right to negotiate corrective actions with Barko's senior management upon identifying non-compliance.
- *Formal Action by FSCA:*
If negotiation for corrective action fails or the FSCA determines that there is a serious risk to consumers or unacceptable conduct by Barko, the FSCA may take formal action.
- *Administrative Fines and Penalties:*
The FSCA may impose administrative fines and penalties for non-compliance with TCF principles and outcomes on Barko.
- *Declaration of Undesirable Business Practices:*
The FSCA has the authority to declare certain business practices undesirable and may order their cessation or amendment.
- *Suspension or Withdrawal of Regulatory Licenses:*
The FSCA may suspend or withdraw Barko's regulatory licenses if non-compliance persists.
- *Termination or Withdrawal of Individual Approvals:*
The FSCA may terminate or withdraw the individual approvals of certain individuals within Barko to act in specific capacities.
- *Damages and Compensation Awards:*
The FSCA may order the payment of damages and compensation awards, including punitive damages, to affected parties due to non-compliance.
- *Referral to High Court:*
The FSCA may refer matters of non-compliance to the High Court for further resolution.
- *Referral to National Prosecuting Authority:*

In cases of severe non-compliance where statutory or common law criminal offences are committed, the FSCA may refer matters to the National Prosecuting Authority for criminal prosecution of individual wrongdoers.

As outlined above, all parties involved must adhere to the TCF principles and outcomes to avoid potential consequences of non-compliance.

11. Review and Monitoring

This policy will be reviewed annually by the Compliance department, with any updates requiring approval by the board of directors.

Regular audits will be conducted by the Compliance department to assess compliance with the policy and make necessary adjustments.

12. Review Date Schedule

DOCUMENT VERSION MANAGEMENT

Version	Drafted by	Date drafted	Approved by	Approval by Forum	Date approved
1	Ms Martie Ruthven	10 October 2024	Dr Chris Kotzé	Board of Directors	12 November 2024

Version	Drafted by	Date
1	Chief Compliance Officer	10 October 2024

TCF declaration:

Reference to the Employer's "Treating Customers Fairly Policy" – Commitment to a fair advice process and duty of care concerning TCF objectives and outcomes.

Fair Advice Process and Duty of Care**1. Advice Process for Key Individuals and Representatives (Advisers)****1.1 The advice process encompasses the following steps:** Introduction/Disclosure Letter

1.1.1 Needs or Suitability Analysis

1.1.2 Advice Record/Disclosures Concerning Product

1.2 Replacement Process/Disclosures**1.2.1 Introduction**

During the initial meeting with a customer, it is mandatory to furnish specific details (disclosures) about yourself and the practice using the provided disclosure letter. To ensure compliance, it is advisable to provide a copy of the letter to the customer and obtain their signature on another copy for recordkeeping.

1.2.2 Needs or Suitability Analysis

Advisers are obligated by law to gather the following information from customers to tailor advice suited to their circumstances and in their best interests:

- Financial situation
- Risk profile
- Needs and objectives
- Financial product experience
- Conducting this analysis in a structured manner facilitates later verification of compliance.

Exceptions to requiring a needs or suitability analysis:

- Insufficient customer information (customer not providing the required information)
- Unforeseen circumstances preventing an analysis

1.2.3 Advice Record

Following the needs or suitability analysis, customers must receive a written advice record comprising:

- Summary of information considered in the advice process
- Financial products considered

- Recommended financial product and rationale for its suitability based on customer needs (Refer to needs analysis and advice record document)

When is an advice record not required?

- While an advice record is obligatory, special warnings must be provided in the absence of a needs analysis due to specified reasons. A section 8(4) advice record incorporates provisions for these warnings.

Possibility of a shorter advice record:

If the customer seeks advice on modifying their contract and:

- Adequate customer information was obtained in a prior need analysis.
- A comprehensive advice record was previously provided.

An abbreviated "mini" advice record can be utilised.

1.2.4 Required Disclosures

Specific details regarding the product provider and the product itself must be disclosed. Most short-term insurers include these disclosures in their quotes or policy schedules. You should submit the quotation (Credit Life) or pamphlet (Funeral) containing this information to the customer and obtain their signed acknowledgement for the adviser's records. You should also request written assurance from the product provider regarding compliance with section 7 of the General Code of Conduct.

1.2.5 Replacement Disclosures

If the transaction involves replacing or partially replacing one product with another, the advice record must accompany the necessary replacement disclosures. (Refer to needs analysis and advice record document)

2. Duty of Care (TCF Objectives)

- 2.1 All Key Individuals and Representatives must always prioritise the customer's interests above their own or their employer's interests.
- 2.2 Fair customer treatment and professional services with integrity and impartiality are mandatory for all Key Individuals and Representatives.
- 2.3 Personal biases or interests of Key Individuals and Representatives must not compromise the quality of services provided to customers.
- 2.4 Key Individuals and Representatives must deliver professional services promptly and comprehensively.
- 2.5 Full disclosure of all relevant facts is required when necessary to prevent misleading customers or other parties.

- 2.6 Key Individuals and Representatives are prohibited from engaging in dishonest, fraudulent, or deceptive conduct, including knowingly making false or misleading statements.
- 2.7 Exercise of reasonable and prudent professional judgment is expected from all Key Individuals and Representatives in providing services.
- 2.8 Key Individuals and Representatives must transparently disclose affiliations with specific suppliers and any associated limitations or constraints to customers, ensuring clarity on the consequences regarding services or products provided.
- 2.9 Proper supervision of subordinates regarding the delivery of financial services is the responsibility of all Key Individuals and Representatives, who must not tolerate or condone any behaviour contrary to TCF Objectives.
- 2.10 Mutual agreement between Key Individuals, Representatives, and customers regarding services is essential.
- 2.11 Key Individuals and Representatives must take reasonable steps to ensure customers fully understand proposed recommendations, enabling informed decision-making.

3. Declaration

As Key Individuals and Representatives of Barko, we pledge our commitment to service excellence, the fair Advice Process, and upholding the Duty of Care. We also embrace the principles outlined in the "**Treat Your Customers Fairly**" outcomes as follows:

- 3.1 Outcome 1: Customers can trust that Barko's culture prioritises the fair treatment of Customers.
- 3.2 Outcome 2: Products and services offered in the retail market are designed to cater to specific customer groups and are tailored accordingly.
- 3.3 Outcome 3: Customers receive transparent information and are kept appropriately informed before, during, and after the point of sale.
- 3.4 Outcome 4: Customers receiving advice can expect suitable recommendations that consider their individual circumstances.
- 3.5 Outcome 5: Customers receive products that meet their expectations, with associated services of an acceptable standard.
- 3.6 Outcome 6: Barko does not impose unreasonable barriers on customers seeking to change products, switch providers, submit claims, or lodge complaints.

Thus done and signed at _____ on _____ 20__.

WITNESSES:

1. _____

2. _____

Employee

Authorised financial product categories and subcategories.

1. Credit Life Insurance (Mandatory Product)
 - 1.1 Death Cover
 - 1.2 Retrenchment Cover (unemployment)
 - 1.3 Disability Cover

2. Funeral Insurance (Voluntary Product)
 - 2.1 Barko Family Standard Policy
 - 2.2 Barko Family Standard Plus Policy
 - 2.3 Barko Family Premium Policy
 - 2.4 Barko Family Premium Plus Policy

Category I Advisory Credit and Financial Services Provider	Advice	Intermediary Services
Long-term Insurance: Subcategory A	✓	✓
Long-term Insurance: Subcategory B1	✓	✓
Long-term Insurance: Subcategory B2	✓	✓
Long-term Insurance: Subcategory B1-A	✓	✓
Long-term Insurance: Subcategory B2-A	✓	✓
Short-term Insurance: Personal Lines		✓
Short-term Insurance: Personal Lines A1		✓
Short-term Insurance: Commercial Lines		✓

Management Tools and Information

The data sets listed below are examples of Management Information that may be used to measure and improve TCF performance. All six outcomes are relevant across all areas of business activity. Where Barko fails to meet the TCF outcomes, the Internal TCF Officer must provide evidence of the actions taken to investigate and rectify the failure.

Sales (outcomes 2, 3, 4 and 5)	
Data Measured	Possible TCF Implications
Sales volume by product type	Product suitability – excessive sales of one product may indicate miss-selling or unsuitable sales, including inadequate suitability analysis.
Sales volume by commission rate/type	The commission rate payable on a particular product may result in product bias, leading to miss-selling or unsuitable sales. As above, this may mean suitability was not adequately assessed.
Sales volume against expectations	Poor sales may indicate incorrect targeting or a too complex product; excess sales may indicate misselling and/or unsuitable sales, including affordability concerns.
Cancellation within the cooling-off period	High cancellation rates may indicate unsuitable advice and/or a customer's misunderstanding of the product.
Early Cancellation/Cancellation rates	Excessive early cancellations may indicate a lack of suitability of advice, as the customer may believe the product is unsuitable or cannot afford premiums and terminate early.
Percentage of file check fails – total and by representative (based on a sample of files)	By Credit and Financial Services Provider / Representative - evidence of systemic weaknesses and/or breaches of the General Code of Conduct (particularly disclosure), which may result in misleading or insufficient information being given and/or miss-selling. By representative – may indicate training needs.
Number of new products introduced during a given period	Review in conjunction with product training statistics
Percentage of representatives completing new product training within a given period	Training and competency of representatives are critical components in ensuring that customers are treated fairly. Poor product knowledge may lead to inappropriate recommendations.
Complaints (Outcomes 1, 2, 3, 4, 5 & 6)	
Data Measured	Possible TCF Implications
Volume of complaints	This may indicate miss-selling or other failings affecting the fair treatment of customers.

Complaints against any representative	As mentioned above, this may reveal a training need.
Complaints against a particular product	This may indicate that the product and/or provider's marketing material is unclear, misleading, or unsuitable for the target market. This could lead to mis-selling or other unfair treatment of customers.
Complaints relating to information supplied by representatives	This could indicate either a lack of clarity and completeness of essential features and other information that was provided by the representative (or in the actual financial services that were rendered) and/or deficiencies in the product information provided by the product provider to the representative
Complaints upheld internally – analysed by reference to whether there was negligence or failure to comply with statutory requirements of unfair treatment.	May reveal trends depending on the underlying reasons and the need for improvements in the relevant areas. Maybe a measure of the fairness of the complaints-handling procedures
Volume and percentage of complaints referred to FAIS Ombud	May identify possible areas of misunderstanding by customers as to what constitutes a complaint (assess possible action to reduce this). This may indicate unfairness in the complaints handling process.
Percentage of complaints to FAIS Ombud upheld	The external measure of the complaints handling process
Percentage of complaints to FAIS Ombud not upheld	This may be indicative that the Credit and Financial Services Provider's complaints handling process is fair and results in the proper outcomes
Percentage of complaints acknowledged within the time frame stipulated in the official Complaints Policy of the Credit and Financial Services Provider	Performance measurement of timeliness of complaints handling process
Percentage of complaints resolved within the time frame stipulated in the official Complaints Policy of the Credit and Financial Services Provider	Performance measurement of complaints being handled in a fair and timely manner
Number of recommendations following complaint raised	Action is being taken to improve standards. This could be evidence of a TCF culture and embedding.
Number of recommendations following complaint that resulted in a change to procedure or policy	Action taken to improve standards/reduce complaints. This could be evidence of a TCF culture and embedding.
Point of Sale (Outcomes 2, 3 and 4)	
Data Measured	Possible TCF Implications

Score rating of quality of financial services rendered and/or information provided following mystery shopping, telephone, or other monitoring	Measure the quality of financial services rendered and/or information provided by a representative. Shortcomings may result in unsuitable sales or other unfair outcomes.
After Sales Service (Outcomes 1, 2, 3, 4 & 6)	
Data Measured	Possible TCF Implications
Percentage of Customers contacted within 12 months of completion and reason for contact.	May be a measure of the standard of customer care, depending on the reason for the contact.
Customers contacted to notify unsuitability of product following TCF review.	Indicative of severe compliance breaches at the point of sale and possibly in other areas resulting in miss-selling. This may be indicative of broader systemic shortcomings.
Culture And Values (Outcomes 1)	
Data Measured	Possible TCF Implications
Percentage of Employees who have completed general TCF training – sales and non-sales categories.	This may indicate TCF awareness and a TCF culture and communication strategy.
Percentage of Employees who have completed additional TCF training specific to their area.	As stated above, it will likely enhance TCF awareness and develop an embedded TCF culture.
The number of representatives who received retraining following high volumes of complaints/file fail checks.	This may indicate TCF awareness and a TCF culture – Barko routinely identifies and acts on TCF issues.
Number of TCF goals in place by business area (financial services, complaints, advertising, after-sales service)	This may be indicative of TCF awareness and an embedded TCF culture.
Percentage of TCF goals achieved by business area for this period.	This may be indicative of TCF awareness and an embedded TCF culture.
Number of sales/non-sales Employees rewarded for meeting TCF targets	This may be indicative of TCF awareness and an embedded TCF culture.
Number of Employees rewarded for suggestions to improve service (whether following complaints or otherwise) – all and/or by business area.	This may be indicative of TCF awareness and an embedded TCF culture.
Documented TCF Policy and Strategy	Management/business owner commitment and strategy
TCF MI reports regular minutes of meetings, reporting structures and review processes.	Embedding of TCF culture and use of TCF MI is being identified, reviewed, and acted on
Employees opinions on how TCF is working and how it could be improved	Captures Employees perception of how fairly Barko treats its customers. Further evidence of the embedding of TCF culture

Advertising and Product Promotion (Outcomes 2, 3 & 5)

Data Measured	Possible TCF Implications
The volume of complaints by promotion type (advertisement)	This could indicate that the promotion is unclear or inaccurate, depending on the nature of the complaint. The nature of the complaint, root cause, and decision can indicate whether a customer has been treated fairly.
Number of compliance breaches picked up by the in-house monitoring process	This may indicate that monitoring processes are operating satisfactorily, a poor technical understanding in the marketing areas, and a poor understanding of what constitutes using transparent, fair and not misleading information – may identify training needs.
Number of compliance breaches picked up by the Regulator	Inadequate financial services being rendered to Customers. This may indicate problems with a poor technical understanding of the product or a lack of familiarity with the General Code of Conduct requirements.

Feedback To Product Suppliers (Outcomes 1 & 5)

Data Measured	Possible TCF Implications
Number of cases of product feedback/suggestions to providers to assist TCF	Feedback on a product's quality/suitability and/or clarity of information may improve consumer outcomes.

Strategy (Outcomes 1)

Data Measured	Possible TCF Implications
The Credit and Financial Services Provider has a strategic commitment (documented) to avert major TCF risks/failings through ongoing scrutiny of product sales targeting.	Credit and Financial Services Provider's commitment to prevent major TCF failings – such as endowment miss-selling.

Advice and Intermediary Services Escalation Process

