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# Treating Customers Fairly Policy Statement

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## Purpose

Ternary Financial Services CC is a Registered Financial Services Provider. The Financial Services Board (FSB) has implemented the “Treating Customers Fairly” (TCF) approach to regulate the market conduct of Financial Service Providers

This document is to give the outlines of how Ternary Financial Services CC implements TCF within its daily operations.

## Policy

Treating Customers Fairly (TCF) is an initiative by the FSB that seeks to ensure that specific, clearly articulated fairness outcomes for financial services customers are demonstrably delivered by regulated financial institutions.

The following *six fairness outcomes* are required to ensure the supply of appropriate financial products and services to customers and enhanced transparency and discipline in financial institutions, resulting in improved customer confidence:

1. Customers can be confident they are dealing with firms where TCF is central to the corporate culture.
2. Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and targeted accordingly.
3. Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
4. Where consumers receive advice, the advice is suitable and takes account of their circumstances.
5. Consumers are provided with products that perform as firms have led them to expect and the associated service is both of an acceptable standard and as they have been led to expect.
6. Consumers do not face unreasonable post-sale barriers imposed by firms to change products, switch providers, submit a claim or make a complaint.

## Our Mission Statement

Ternary aims to create financial wellness for all its clients by providing an uncompromising standard of financial advice. We focus on providing consistent, professional advice by leveraging of our in-house investment expertise and financial planning processes. We operate in an environment where clients’ needs are expertly met by ensuring that continual professional development of our employees remain a cornerstone of our culture.



## **Implementation of TCF Principles**

### **Adviser and Staff Training and Competence**

We ensure that all advisers and staff are appropriately versed on all of the fundamental principles of TCF. In addition, where applicable, advisers and staff are comprehensively trained in order to suitably advise on and efficiently provide our services.

We ensure that all TCF training is kept up to date in order to take account of market and regulatory changes.

Ternary has a strong focus on the professional development of its employees. This is to ensure that all of our advisers and staff achieve the necessary qualifications and training in order to carry out their job functions with the required competence level.

### **Communication**

All communications with customers will be made in an open and transparent manner.

### **Customer Service**

Ternary Financial Services CC has in place set service standards for our customers so they can be sure of the service level to expect from us.

### **Suitability**

All clients will be correctly classified to ensure they are offered the correct level of protection. All recommendations made to our customers will be suitable for their requirements and their investment objectives. In addition, all customers will be made aware and clearly understand the risks inherent with any services or products offered.

### **Management Information (MI)**

We use MI to ensure that our TCF commitment is being met. Good MI enables the management and members of Ternary Financial Services CC to make informed business decisions in the best interests of its customers. Good MI should be accurate, timely, relevant and consistent. Other MI reporting, including compliance reporting is produced throughout the firm.



## Policies and Procedures

Ternary Financial Services CC has in operation a significant number of policies and procedures designed to manage any conflicts of interest which may arise in our fair treatment of customers.

The following list is an indication and by no means exhaustive.

- **Compliance Manual** – The Company has a detailed Compliance Manual in circulation and forms part of all adviser and staff training.
- **Privacy Policy** – We treat Customer privacy extremely seriously and have in place a comprehensive policy which complies with all aspects of the Protection of Personal Information Act.
- **Conflicts of Interest Policy** – Any potential conflicts between the firm and its customers and between customers are identified, recorded on our conflicts register and managed accordingly.
- **Complaints** – Ternary Financial Services CC strives to provide the very best level of customer service. We deal with customer complaints in a fair and objective way including compensation where necessary. All complaints are recorded by our Compliance Department and reported and analysed in Company MI and Board meetings. We have implemented a separate complaints policy.

## Summary

The majority of the above TCF policies are longstanding practices throughout Ternary Financial Services CC. However we acknowledge that TCF is an ever developing and continuous process so we are constantly reviewing our policies and procedures to ensure that TCF remains of paramount focus and importance.

If any clients wish to give feedback on how we can improve our service we will appreciate it very much.