

Treating Customers Fairly (TCF) Policy Statement

Rutherford Asset Management is an authorised financial services provider. Our mission/strategic objective is to support independent investment advice, to promote consistent investment returns and to provide unparalleled service excellence. Treating Customers Fairly is an integral part of our strategy.

Our TCF policy is structured according to the guidance provided by the Financial Services Conduct Authority (FSCA) to ensure we consistently deliver fair outcomes to our clients. We take responsibility for Rutherford Asset Management and all staff providing an enhanced service quality to clients, based on a culture of openness and transparency.

Rutherford Asset Management will strive to comply with and contribute to the TCF fairness outcomes, viewed from the perspective of the customer:

The six fairness outcomes:

- **Outcome 1:** Customers are confident that they are dealing with providers where the fair treatment of customers is central to the provider's culture.
- **Outcome 2:** Products and services marketed and sold in the retail market is designed to meet the needs of identified customer groups and are targeted accordingly
- **Outcome 3:** Customers are given clear information and are kept appropriately informed before during and after the time of contracting
- **Outcome 4:** Where customers receive advice, the advice is suitable and takes account of their circumstances
- **Outcome 5:** Customers are provided with products that perform as providers have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect
- **Outcome 6:** Customers do not face unreasonable post-sale barriers to change products, switch provider, submit a claim or make a complaint

Achieving the outcomes:

Rutherford Asset Management will aim to demonstrate through our behaviours and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle to which we can contribute. These may include:

- **Product and service design:** Products and services and their distribution strategies are designed and developed for specific target markets, based on a clear understanding of the likely needs and financial capability of each customer group
- **Promotion and marketing:** Products are marketed to specific target groups, through clear and fair communications that are not misleading and are appropriate to the target group.
- **Advice:** Where advice is provided, advisers are fully equipped to provide advice that is suitable to the needs of the customer concerned, following the objective of TCF and avoiding conflicts of interest
- **Point of Sale:** To provide clear and fair information to enable customers to make informed decisions about transacting with Rutherford Asset Management and our services. Product risks, commitments, limitations and charges must be transparent
- **Information after point of sale:** To provide customers with ongoing relevant information to enable them to monitor whether the product or service continues to meet their needs and expectations, and provide acceptable levels of service for post-sale transactions or enquiries
- **Complaints and claims handling:** To honour representations, assurances and promises that lead to legitimate customer expectations. Legitimate expectations must not be frustrated by unreasonable post sale barriers. There is a requirement for fair and consistent handling of claims and a mechanism to deal with complaints timeously and fairly.

In order to fulfill our commitment to Treating Customers Fairly, we will focus on the following aspects:

- We will follow the requirements of the FAIS General Code of Conduct as well as our Conflict of Interest policy in dealing with our customers.
- We will put management information mechanisms in place that are designed to monitor and measure Rutherford Asset Management's performance in delivering the relevant fairness outcomes.

- All our members of staff are trained to deal with our clients and are committed to maintaining high standards of services
- Our staff are not remunerated or incentivised in ways which encourage them to deal with our client in an unfair or biased manner.
- We will always tell customers what they can expect from our relationship
- We will provide appropriate after sales information and service to customers
- We will monitor the continuing performance of products or funds that we have a recommend and sold to customers to assess the ongoing suitability of the product for the customer.
- We will ensure open-communication lines with product suppliers we deal with and ensure that we understand their products and services
- We will review our TCF policy on an ad hoc basis but at least annually

Complaints handling

- We will handle complaints fairly, promptly and impartially
- In dealing with complaints, we will treat all situations alike and give careful consideration to whether an error might have affected a wider class of customers and what should be done to remedy this.
- We will pay attention to the outcomes of complaints which can serve as an important source of intelligence about the health of our business and systems. We will investigate the root causes of complaints and obtain feedback from customers who have experienced our complaints process in order to improve the level of services that we provide
- We will measure the length of time taken to deal with a complaint, the outcome and the way in which the outcome is communicated to the customers in order to ensure that we are treating our customers fairly

Treating Customers Fairly in our Business

- We encourage and welcome feedback from staff and customers on our services and procedures
- Stagg objectives include TCF as an explicit and measurable objective and performance against this objective will form part of staff competency ratings.
- Before we contract with a third party, we will satisfy ourselves of their commitment to treating our customers fairly. In particular we will consider the TCF policy and the management

information that they can provide to demonstrate the fair treatment of our customers

- Our complaints process will be clear and easy to understand

For any queries or feedback in relation to Treating Customers Fairly (TCF) at Rutherford Asset Management, you can contact us all the following number or addresses:

Contact Name: Graham Wilkins
Role: Managing Director
Tel No: 021 879 5665
Email: graham@rutherfordam.co.za

