

TREATING CLIENTS FAIRLY POLICY

Version 02.2023



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1. Introduction

- 1.1. APLFX (PTY) LTD (hereinafter “the Company”, “us”, “our” “we”) is incorporated in South Africa and registered under the Companies and Intellectual Property Commission (<http://www.cipc.co.za/>) with a registration number 2021/804619/07. The Company is authorised and regulated by the Financial Sector Conduct Authority (“FSCA”) with authorisation number 52045, to provide intermediary services in connection with derivative products, operating under the Financial Advisory and Intermediary Services Act (“FAIS Act”).
- 1.2. The Company is acting as a Financial Service Provider and in accordance with the FAIS Act, is required to have in place and disclose to its Clients this Complaints Resolution Process (the “Process”).

2. Outcomes

- 2.1. The FSCA has set out an “Outcome” based regulatory and supervisory approach designed to ensure that financial institutions delivery specific, clearly set out fairness outcomes for financial customers.
- 2.2. There are six outcomes that financial institutions are expected to demonstrate:
 - **Outcome 1:** Customers can be confident they are dealing with firms where TCF is central to the corporate culture.
 - **Outcome 2:** Products & services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.
 - **Outcome 3:** Customers are provided with clear information and kept appropriately informed before, during and after point of sale.
 - **Outcome 4:** Where advice is given, it is suitable and takes account of customer circumstance.
 - **Outcome 5:** Products perform as firms have led customers to expect, and service is of an acceptable standard and as they have been led to expect.
 - **Outcome 6:** Customers do not face unreasonable post-sale barriers imposed by firms to change product, switch providers, submit a claim or make a complaint.

3. Company's Approach

- 3.1. Our priority is to provide Clients with an excellent service, through listening and understanding the Clients’ needs and what is important to them. Our aim is to treat clients fairly and deliver high quality services which meet their expectations throughout their relationship with the Company.
- 3.2. The Company recognises that its employees are critical to delivery a positive client experience and ensuring customers are treated fairly. The Company’s culture and values encourage and support the Company’s employees to deliver this.
- 3.3. All the Company’s employees are fully trained in dealing with Clients and doing so fairly. The Company remunerates and incentivises employees to encourage them to deal with all Client’s fairly and continue to find ways to improve.



4. Complaints

- 4.1. The Company aims to respond in a timely manner to Clients' and Potential Clients' questions, queries and complaints which are addressing any issues and concerns. All Client complaints are dealt with and escalated to the appropriate department as is required by the Company to remain compliant with the regulator and the Ombudsman.
- 4.2. More information on how the company deals with Client Complaints, can be found in the policy within the company's legal document section.
- 4.3. The Company's Complaint Policy is in line with the FSCA guidance and with the principles of the FSCA that "a firm must pay due regard to the interests of its customers and treat them fairly".

5. Services

- 5.1. The Company keeps Clients fully informed in a manner which is fair, clear, and not misleading. The Services are delivered with clarity and transparency and do not contain any hidden conditions or rely on complex technical definitions.
- 5.2. The Company also makes sure that Clients understand the risks associated with the services from the outset of an instruction and these can be found in the Company's Risk Disclosure Policy. We work hard to make sure that the service and risk information remains clear and prominent at all times. If there are any conflicts of interest, the Company follows the process as this is provided in the Conflict-of-Interest Policy, as this can be found on the Company's website.

