

Treating Customers Fairly (TCF) Policy

Capstone Wealth Managers 293 (Pty) Ltd (Capstone) is a financial services provider that fully supports the promotion of treating customers fairly as regulated by the Financial Services Conduct Authority (FSCA). At Capstone, our primary objective is to ensure that we put the principles set out by the FSCA for treating customers fairly at the very core of our business and we understand that it is essential for the success of our business.

Policy Statement

At Capstone we understand that our customers are at the heart of our business and that the fair treatment of each and every customer is essential to our success. As part of our overall approach, we are fully committed to treating our customers fairly and as such we endeavour to consistently deliver fair outcomes to our customers and take responsibility for the company and staff. We recognise that our employees, irrespective of their role, are critical to delivering a positive customer experience and ensuring our customers are treated fairly and our culture and values encourage and support our employees to deliver this.

As part of our TCF policy, Capstone has developed a culture of openness and transparency as we strive to deliver a positive customer experience that reassures the confidence of customers in our business. Capstone has embraced the following six outcomes as stipulated by the FSCA to develop our TCF policy:

Outcome 1: Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm's culture.

Outcome 2: Products and 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 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 firms 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 product, switch provider, submit a claim or make a complaint.

How Capstone delivers these outcomes:

Outcome 1: Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm's culture.

- Capstone shows commitment to adhere to the rules and principles of the Authority and other regulatory bodies. All representatives are registered with the FSCA. Capstone sends out a FAIS Disclosure to all clients and we have a compliance officer who works with us to ensure that all our policies and procedures are in place.
- There is a written TCF policy in place.
- Client and partner feedback is taken on board and used to improve our services.
- Staff is briefed on TCF and their role in delivering the outcomes. This is communicated through training and meetings.

- Administration and record keeping systems are of a good standard and reviewed periodically. Client files which are stored both electronically and in physical files and all old files are archived and can be retrieved when the need arises as stipulated within the Financial Advisory and Intermediaries Act 37 of 2022.

Outcome 2: Products and Services to Meet Client needs.

- Capstone has been in existence since 1998 and has a proven track record of sustained investment performance. This performance is partly due to robust, independent and tested methods and an active investment team and investment consultants who perform due diligences on potential investments.
- We offer a range of products and services to our clients i.e. Investment management and financial advice. Under investment management we offer multi asset funds, managed shares portfolios (local and offshore) and equity linked notes.
- We also offer financial advice in the form of investment planning, estate planning, tax planning and retirement planning.
- Capstone has a company brochure which details all these products and services and this is available to all new clients and/or when requested or can be accessed from our website www.cstone.co.za.
- N.B Capstone also offers clients funds from other underlying administrators should the clients wish to do so. Therefore, clients are not restricted to invest in Capstone funds alone. We have a list of Product suppliers and their contact details which is available upon request.

Outcome 3: Clients kept appropriately informed.

- Capstone financial advisors regularly arrange meetings with their clients to inform them of their investment performance and any recommendations that they may have with regards to their investments. Meeting minutes are then sent to the client after the meeting and these minutes are then filed electronically and physically.
- All clients receive a copy of the Capstone newsletter every quarter either via email or is given personally to specific clients who do not make use of electronic communication , a FAIS Disclosure document and all other correspondence and this is then recorded in their electronic files. The newsletter can also be downloaded from our website www.cstone.co.za.
- Capstone also has investor presentations to update and inform clients about the markets and the performance of their investments.

Outcome 4: Advice is Suitable and takes account of client circumstances.

- We ensure that all written and verbal advice is as easy to understand as possible and that clients are clearly informed of any risk and consequence of any action or inaction. Clients are given a record of advice and/or an investment strategy that documents the recommended advice.
- We have a process of matching funds/ products to clients' needs and for dealing with instances where advice is considered to be unsuitable. This is done through thorough due diligence before an investment is made.
- We have a conflicts of interest policy which can be found on our website. This shows that Capstone is aware of potential conflicts and has policies in place to avoid conflicts where possible.
- We ensure that our advisers provide advice only in areas in which they are competent and we have measures in place to monitor this.

Outcome 5: Products behave as expected.

- We monitor products and funds carefully to ensure clients' legitimate expectations are met. Client's expectations, fees, charges, consequences of action or inaction etc. are addressed in the mandate, investment strategy, and record of advice and the disclosure letter. These documents issued to the client will also clearly explain our fees/charges and what the clients can expect in return.
- We have a fee schedule available upon request. All advisers at Capstone have a copy of this schedule which is a guideline of how fees can be charged by the financial adviser.
- We monitor both our own service standards and those of others in the value chain.

Outcome 6: No Unreasonable post sale barriers

- We have a clear complaints process, and we take verbal complaints seriously, and respond in writing where appropriate, keeping clients informed of progress at appropriate intervals.
- We monitor complaints and use the resulting management information to make improvements to our processes. Our internal operations processes are updated accordingly and can be found on the server.
- We ensure that clients can choose to move away from us if they wish and do not create unnecessary barriers for them in doing so. Capstone has a documented termination process in place.
- All our investment agreements include appropriate details on how to terminate the agreement and to whom and where a complaint can be lodged.

Consequences of Non-Adherence

The management and staff of Capstone is required to adhere to this policy and disciplinary action will be taken in terms of individuals who do not comply with the requirements described in this policy.

Training and Awareness

All staff will receive training on the outcomes in this policy and will also receive a copy of the policy.

Review

This policy will be reviewed as and when required, but at least annually.