



TREATING CUSTOMERS FAIRLY POLICY

FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT

OAKHAVEN CAPITAL (PTY) LTD

FSP 43738

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Approved by: Bruce Thistlewhite
Signed by:

1. INTRODUCTION

- 1.1. Oakhaven Capital (Pty) Ltd ("the FSP") is an authorised financial services provider in terms of the Financial Advisory and Intermediary Services Act (FAIS) and is regulated by the Financial Sector Conduct Authority (FSCA).
- 1.2. The FSP renders financial services as a Fixed Income and Hedge Fund Manager in respect of regulated collective investment scheme portfolio's in terms of a delegation or sub-delegation agreement entered with an approved management company or authorised discretionary financial services provider.
- 1.3. Treating Customers Fairly ("TCF") is an outcomes-based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes are delivered by financial services providers who conduct their business in South Africa.
- 1.4. The TCF initiative forms a key component of the FSCA mandate to broaden consumer protection and to ensure better conduct of financial services providers.
- 1.5. The FSP has adopted and embraced TCF to contribute to a more robust financial services sector.

2. CONTROL MEASURES

- 2.1. The FSP has incorporated the following control mechanisms into its operations to ensure that it contributes to fairness outcomes for its clients:
 - Leadership:
Management will provide direction and monitor the delivery of TCF outcomes.
 - Strategy:
The TCF aims and values will form a core part of the FSPs business activities.
 - Decision-making:
Decision-making protocols ensure that decisions having an impact on clients will be taken in accordance with this TCF Policy.
 - Governance and controls:
The governance structures of the FSP will cater for TCF considerations and include TCF measurement systems and TCF risk identification methods.
 - Performance management:
Key Individuals and Representatives are trained to deliver appropriate TCF outcomes.
 - Reward:
Remuneration, incentive and reward policies take cognizance of the TCF outcomes and ensure that conflicts of interest are avoided or mitigated

accordingly.

3. TCF OUTCOMES

3.1. The FSP must endeavour to achieve the following six TCF outcomes when rendering financial services:

OUTCOME 1:

Clients must be confident that they are dealing with an FSP where fair treatment of clients is central to the FSPs business operations at all times.

OUTCOME 2:

The services rendered by the FSP is tailored and designed to meet the needs of its identified client groups and is also targeted specifically to them.

OUTCOME 3:

Clients are provided with clear and concise information in respect of financial products and the financial services being provided to them before, during and after the time of contracting with the FSP.

OUTCOME 4:

Where clients receive discretionary financial services, these services must be suitable and take into consideration the relevant investment objectives, risk appetite and the specific circumstances of those clients.

The FSP will always provide financial services within the scope and ambit of the signed mandates.

OUTCOME 5:

Clients must be provided with financial services of an acceptable, professional and high standard and further be made aware of the risks that are involved when investing into certain financial products.

OUTCOME 6:

Clients may not face unreasonable barriers to terminate their relationship with the FSP or to file a complaint if and when the need arises to do so against the FSP.