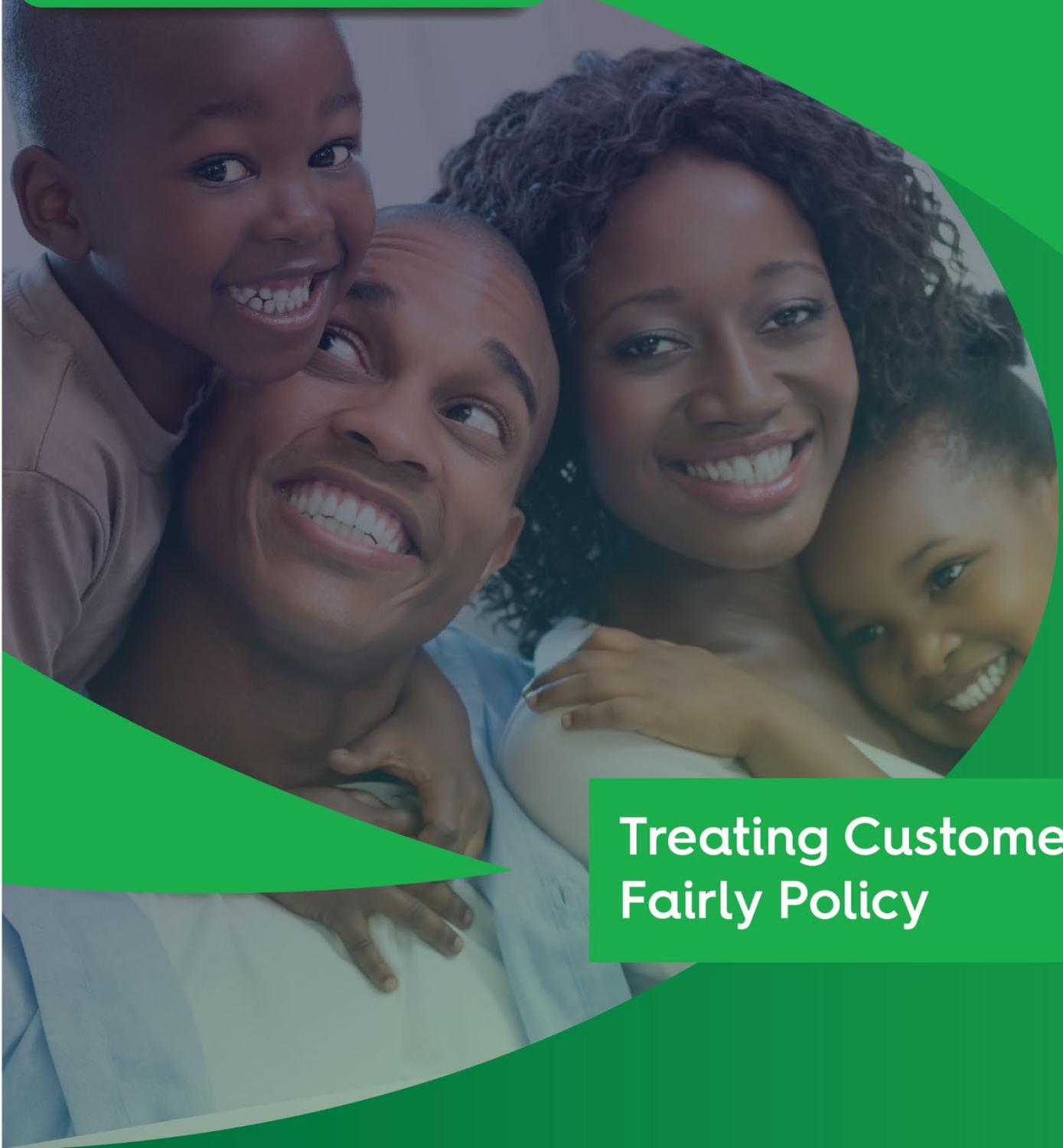


Dis-Chem+

HEALTH

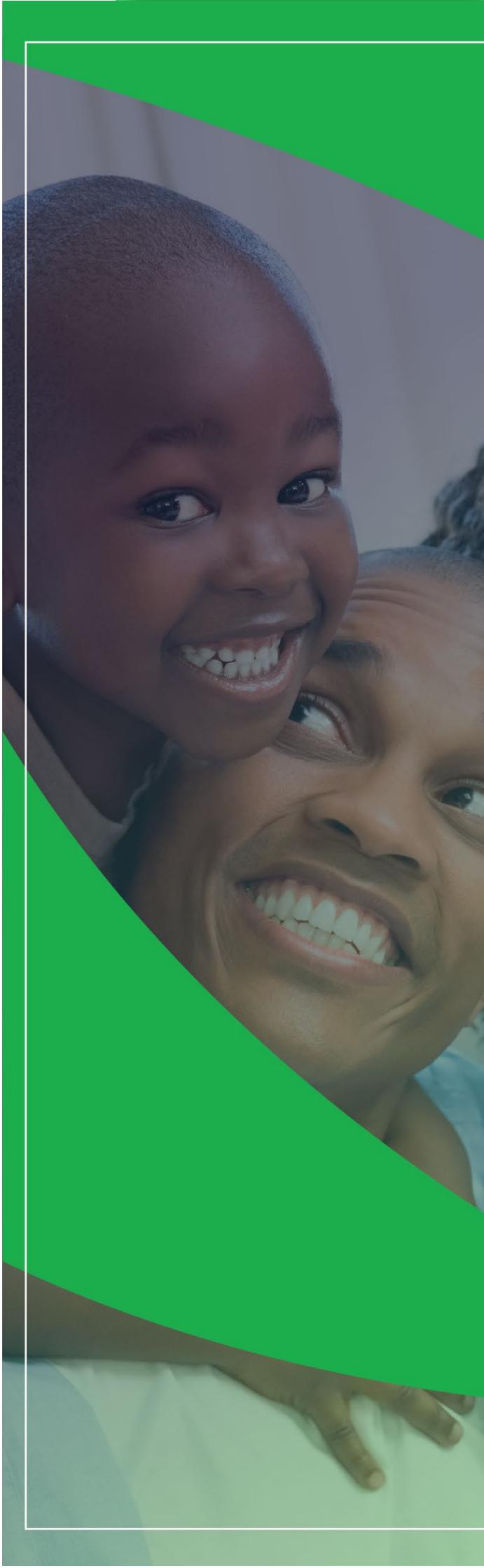
In partnership with kaelo

2022



Treating Customers
Fairly Policy

kaelo



Contents

1. Introduction.....	3
2. Our TCF Mission Statement.....	3
3. Our TCF Principles.....	3
4. Assessing and Implementing our TCF Principles.....	4
Marketing.....	4
Product Design.....	4
Sales, Advice, Management.....	4
Post-Sale Information and Support.....	4
5. Claims.....	5
6. Policies and Procedures.....	5
Privacy Policy.....	5
Conflicts of Interest Policy.....	5
7. Management Information (MI).....	5
8. Awareness/Training.....	5
9. Compliance.....	6
10. Remuneration.....	6
11. Complaints.....	6
12. Conclusion.....	6



1. Introduction

This The Financial Services Conduct Authority's (FSCA) Treating Customers Fairly (TCF) initiative is primarily based on the obligation set out in Outcome 6 requiring a firm to pay due regard to the interests of its clients and treat them fairly. Kaelo is fully committed to TCF and this Policy has been designed to demonstrate the application of TCF during the course of our day to day activities.

TCF is embedded in the Policyholder Protection Rules and Kaelo supports the TCF initiative and satisfies FSCA's six core consumer outcomes which explain what it wants TCF to achieve for consumers. These are:

- Consumers can be confident they are dealing with firms where TCF is central to the corporate culture.
- Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and targeted accordingly.
- Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- Where consumers receive advice, the advice is suitable and takes account of their circumstances.
- 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.
- Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a Claim or make a complaint.

2. Our TCF Mission Statement

We will act with integrity in everything that we do and aim to protect the interests of our customers at each stage of the product life cycle.

We will meet as best we can the unique needs of each customer by offering a transparent, efficient and professional service and constantly reviewing our products to identify areas of improvement.

3. Our TCF Principles

- Customers will be provided with clear information and kept appropriately informed before, during and after the point of sale.
- If we give advice to our customers, the advice will be suitable and take account of their circumstances.
- Our level of service and product performance will meet the expectations of our customers as far as reasonably possible.
- We will ensure that there is no barrier for customers to express their requests, concerns or complaints, and we will always be responsive to them.



- Products and services will be designed to meet the needs of clients.

4. Assessing and Implementing our TCF Principles

Marketing

All Kaelo’s Product promotions and marketing literature is reviewed to ensure that they are appropriate for the target audience and are presented in a clear, fair and not misleading manner.

Product Design

Each product developed by us or our business partners follow diligent assessments. We share accountability for the fair treatment of our mutual customers. Our products are designed to cater to the customer’s needs, limiting risk or exposure. Our products do not have hidden penalties or large upfront costs. Legislation and compliance is considered during the design of our products ensuring fairness and security from the customer’s perspective.

Sales, Advice, Management

Kaelo does not provide advice directly to policyholders but when providing any information to its broker network Kaelo’s representatives obtain a detailed understanding of the clients’ needs so that the information provided is suitable and appropriate.

We ensure that our clients understand the risks involved with any service or product offered and are aware of all applicable charges. From the outset, we obtain a basic understanding of each client’s individual needs related to the products we offer. We provide customers with clear information.

We provide clear explanations of products that is in no way misleading. All disclosures required by legislation are made in writing.

Post-Sale Information and Support

Kaelo strives to keep its clients informed at all times. Appropriate records are provided as required and on an ongoing basis. We have appropriate capacity and processing arrangements in place to ensure continuous support and no post-sale barriers. All communication with customers is made in an open and transparent manner that is unambiguous and not misleading.

Kaelo has in place a set of service standards for our customers so they can be sure of the service level to expect from us.



5. Claims

All Claims received are timeously and diligently responded to by dedicated and well-trained staff. Our customers are kept updated as to the status of their Claims. We strive to achieve a fair outcome on each Claim.

6. Policies and Procedures

Kaelo has a number of policies and procedures designed to manage any conflicts of interest which may arise in our fair treatment of customers.

The following is an indication:

Privacy Policy

We treat customer privacy extremely seriously and have in place a comprehensive policy which complies with all the aspects of the Protection of Personal Information Act.

Conflicts of Interest Policy

Any potential conflicts between the company and its customers are identified, recorded on our conflicts register and managed accordingly.

7. Management Information (MI)

Kaelo produces MI in order to assess its performance against TCF outcomes. We ensure that MI is accurate, timely, consistent, and relevant in order to assist the business in making informed decisions in the best interests of our clients.

We use certain MI to ensure our TCF commitment is being met. MI enables management and employees to make informed business decisions in the best interests of our customers (example analyzing Quality, Compliance and Complaints, etc.)

8. Awareness/Training

Kaelo ensures that all representatives and staff are familiar with the fundamental outcomes of TCF. In addition, where applicable, representatives and staff are trained in order to efficiently explain and provide information on our products and services. We make sure that all of our representatives and staff achieve the necessary qualifications and training in order to carry out their job functions with the required competence level. We undertake regular monitoring and assessment of our representatives and staff so that we can be certain of their competence.



9. Compliance

Kaelo has a compliance team who is independent and regularly monitors all key areas of regulatory compliance including TCF.

10. Remuneration

Kaelo operates a remuneration model that mitigates sales bias and rewards non-sales staff in a way that would not negatively impact the treatment of its clients. We have internal processes which monitor these principles. Our incentive structures rewards behaviour consistent with the TCF outcomes.

11. Complaints

Kaelo aims to provide excellent customer service and complaint handling is a major component of its TCF measures. We deal with customer complaints fairly and objectively and attempt to put things right as quickly as possible, in accordance with the rules laid down by FSCA. All complaints are recorded and monitored by our compliance team and reported and analysed through MI.

12. Conclusion

Kaelo's culture is and has been throughout the years in line with the outcomes stipulated by FSCA's TCF initiative. However, we frequently review our policies, procedures and practices to ensure that TCF remains a crucial part of our business.

We ask our clients to provide us feedback, sometimes formally through customer surveys, so that we can improve our service. The information we collate from our clients can be reflected in company MI and reviewed by senior managers, directors and board members to help shape any strategic decisions.