



TREATING CUSTOMERS FAIRLY (TCF) POLICY

GHT's 6 TCF Principles

GHT is committed to embedding the Treating Customers Fairly (TCF) principles into all aspects of its business operations, ensuring fair outcomes for our clients, particularly the vulnerable SASSA grant recipients we serve. Our market conduct process is designed to proactively address the six TCF outcomes throughout the customer lifecycle, from product design to post-sales service.

These six outcomes are the FSCA's established framework for fair customer treatment and have been embedded in the FAIS General Code of Conduct since Board Notice 194 of 2017. Here's how GHT implements the six TCF principles:

TCF Outcome 1: Customers can be confident that they are dealing with an FSP (GHT) where the fair treatment of customers is central to our corporate culture.

▪ Implementation at GHT:

- **Core Values:** Our company values explicitly include "Integrity" and "Empathy," which underpin our commitment to fair customer treatment. These values are communicated to all staff and agents during onboarding and ongoing training.
- **Tone from the Top:** Senior management actively champions the TCF principles, emphasizing their importance in internal communications and decision-making processes.
- **Compliance Framework:** The existence of a dedicated Compliance Officer and a robust compliance framework, as evidenced in the Compliance Officer's Report, demonstrates our commitment to embedding fair treatment into our operational structure.
- **Performance Management:** While sales targets are important, agent performance is also evaluated on adherence to compliance procedures and ethical conduct, reinforcing that fair treatment is not secondary to sales.
- **Whistleblowing Policy:** GHT has a whistleblowing policy in place to encourage the reporting of any unfair practices without fear of reprisal, further fostering a culture of ethical conduct.

TCF Outcome 2: Products and services marketed and sold are designed to meet the needs of identified customer groups and are targeted accordingly.

▪ **Implementation at GHT:**

- **Target Market Focus:** GHT's core business strategy is centred on understanding the specific needs and financial constraints of SASSA grant recipients. Our product offerings (currently African Unity and 1Life funeral cover) are selected and presented as affordable and accessible solutions for this demographic.
- **Product Knowledge Training:** Agents receive comprehensive training on the features, benefits, and limitations of the funeral cover products, specifically explained to them in a way that is easily understandable for our target market.
- **Suitability Assessment:** While not a formal "advice" model, agents are trained to have conversations that help determine if the product aligns with the client's basic needs for funeral cover. Emphasis is placed on affordability and understanding the core benefits.
- **Value-Added Services:** Services like assistance with claims processing and language support are designed to directly address the specific challenges and needs of our client base.
- **Marketing Materials:** Brochures and flyers use clear, simple language to ensure the information is understandable to our target market.

TCF Outcome 3: Customers are provided with clear, suitable information and kept appropriately informed before, during, and after the point of sale.

▪ **Implementation at GHT:**

- **Clear Communication:** Agents are trained to explain policy terms, conditions, exclusions, and premiums in a clear, simple, and understandable language, avoiding jargon. Emphasis is placed on communicating in the client's home language.
- **Disclosure Requirements:** Agents are trained on and monitored for adherence to all necessary disclosure requirements as mandated by FAIS, ensuring clients receive essential information before making a decision.
- **Confirmation Calls:** The mandatory confirmation call process serves as a crucial step to reiterate key policy information, verify the client's understanding, and address any potential misunderstandings before the policy is finalized. This confirmation call is done in the client's home language by our confirmation team in Johannesburg.
- **Frequent SMS Communication:** Regular SMS updates keep clients informed and engaged with GHT.
- **Easy Access to Information:** Walk-in branches provide a physical point of contact for clients to seek clarification or assistance.
- **Claims Assistance:** Providing direct assistance with claims processing ensures clients are supported during a difficult time and kept informed of the progress.



TCF Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

- **Implementation at GHT:**

- **Focus on Information and Education:** While GHT's primary model involves providing information about pre-designed products rather than personalized financial advice in the comprehensive sense, agents are trained to ask basic questions to gauge the client's needs and affordability within the context of funeral cover for SASSA grant recipients.
- **Emphasis on Affordability:** Training stresses the importance of ensuring the premium is affordable for the client given their grant income (<10%).
- **Monitoring for Mis-selling:** Confirmation calls and reviews of sales interactions aim to identify and address any instances where agents may be misrepresenting products or not adequately considering the client's basic circumstances.

TCF Outcome 5: Customers are provided with products that perform as insurers have led them to expect, and the associated service is of an acceptable standard to what they have been led to expect.

- **Implementation at GHT:**

- **Partnerships with Reputable Insurers:** GHT partners with well-established and reputable insurers known for their claims-paying ability and service standards.
- **Claims Assistance:** Actively assisting clients with the claims process ensures they receive the benefits they are entitled to in a timely and efficient manner, meeting their expectations.
- **Service Standards:** Training emphasizes the importance of professional and empathetic conduct by agents and administrative staff. The "Buddy System" aims to ensure continuity of service even in staff absences.
- **Complaint Handling Process:** GHT maintains a dedicated **Complaints Management Framework**, which sets out the categorisation, escalation, timelines, and record-keeping requirements for all client complaints, including escalation to the National Financial Ombud Scheme (NFO) or the FAIS Ombud where a complaint is not resolved to the client's satisfaction. See that policy for full detail.
- **Confirmation Calls:** Reinforcing the key benefits and terms during confirmation calls helps to align customer expectations with the actual product features.



TCF Outcome 6: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

▪ **Implementation at GHT:**

- **Claims Assistance:** As mentioned, providing direct support with claims significantly reduces barriers for clients during a difficult time.
- **Accessibility of Branches and Agents:** The physical presence of branches and the availability of agents provide accessible channels for post-sale interactions, including inquiries and potential complaints.
- **CRM System (GHTConnect):** GHTConnect helps track client interactions and manage relationships, facilitating smoother post-sale processes.
- **Language Support:** Offering services in the client's home language reduces communication barriers for post-sale interactions.
- **Complaints Escalation:** The escalation path to the Ombud is detailed in the communication given to the client at the point of sale and sent via URL download to the client's phone, consistent with GHT's Complaints Management Framework.
- **Policy Changes and Cancellations:** For any policy changes, the client needs to contact the GHT office at either of the following numbers: 010 140 1563 / 010 140 1559 / 010 140 0622 or 087 330 2444 or send a WhatsApp to 063 387 7649. Alternatively, an email can be sent to the following addresses: admin@policymaker.co.za or cover@policymaker.co.za. The client will be supplied with information and instructions on how to make any changes to their Policy.

For Cancellations the client needs to contact the GHT office at either of the following numbers: 010 140 1563 / 010 140 1559 / 010 140 0622 or 087 330 2444 or send a WhatsApp to 063 387 7649. Alternatively, an email can be sent to the following addresses: admin@policymaker.co.za or cover@policymaker.co.za. There is also an SMS portal to use. The client can send an SMS to 34548. The client will be supplied with information and instructions on how to cancel the policy. An affidavit needs to be completed in the event of any policy cancellation. Notice of 30 days must be given for any policy cancellation.

Ongoing Monitoring and Improvement

GHT's commitment to TCF is an ongoing process. We continuously monitor our market conduct through:

- **Regular Compliance Audits:** To assess adherence to TCF principles and identify areas for improvement.
- **Analysis of Customer Feedback and Complaints:** To understand where customer experiences may fall short of expectations.



- **Review of Sales and Marketing Materials:** To ensure they remain clear, fair, and not misleading.
- **Ongoing Training and Development:** To reinforce TCF principles and address any identified knowledge gaps among staff and agents.

By actively implementing these measures across all aspects of our business, GHT strives to ensure that the fair treatment of our valued SASSA grant recipient clients remains central to our operations and corporate culture.

Approved by:  _____

Director / Compliance Officer of GHT

Date of Approval: 24/8/2026