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TREATING CUSTOMERS FAIRLY POLICY (TCF)

The key principle central to GAIA's approach and ethos is that we are here to provide the best possible investment solution to clients in Infrastructure space. The client comes first and this is understood company wide. GAIA is committed to the fair treatment of all clients throughout the life cycle of our products.

Treating Customers Fairly:

The Financial Services Board ("FSB") published its "Treating Customers Fairly ("TCF") Roadmap" in March 2011 as a first step towards achieving TCF fairness outcomes and culture framework requirements within financial services businesses. In terms of this roadmap it is a requirement that firms measure their activities against six TCF fairness outcomes (the "Outcomes") that aim to reduce market conduct risks and protect consumers of financial products:

Outcome 1 ("Culture"):

Customers are confident that they are dealing with a financial services provider where the fair treatment of customers is central to its culture.

Outcome 2 ("Products and Services"):

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 ("Clear and Appropriate Information"):

Customers are *given* clear information and are kept appropriately informed before, during and after the time of contracting.

Outcome 4 ("Customer Advice"):

Where customers receive advice, the advice is suitable and takes account of **their circumstances**.

Outcome 5 ("Product Performance Expectations"):

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 ("Post Sale Barriers"):

Customers do not face unreasonable post-sale barriers to change product, exit after the investment matures or make a complaint.

The sustainability of our business lies in our ability to produce consistent superior long-term investment performance, underscored by service excellence and integrity of our business. The TCF framework designed by the FSB is a set of principles/norms that will find their way into law via existing legislation, regulation and guidelines. As they do we will continually embed them in our strategy, governance and daily processes.