Treating Customers Fairly (TCF) Policy

Embedding Fair Customer Outcomes Across the Credit Lifecycle

Reset Solutions (Pty) Ltd | Registration No. 2015/095722/07

Authorised Financial Services Provider — FSP No. 53772
Registered Credit Provider — NCRCP 18699

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1. Introduction and Purpose

Reset Solutions (Pty) Ltd, registration number 2015/095722/07 (formerly Reset Technology Solutions (Pty) Ltd), trading as "Reset Solutions" ("Reset", "the Company" or "we"), is an authorised Financial Services Provider (FSP No. 53772) and a registered credit provider (NCRCP 18699) with the National Credit Regulator. Reset provides payroll-deduction consolidation lending and associated financial services primarily to government employees.

This Treating Customers Fairly ("TCF") Policy sets out the principles, governance structure and operational controls through which Reset embeds fair customer outcomes into every stage of the product and client lifecycle, from product design and marketing through to after-sales service, debt review, collections and complaints handling.

This Policy gives effect to the Financial Sector Conduct Authority's ("FSCA") TCF framework, the market conduct principles introduced by the Financial Sector Regulation Act 9 of 2017 ("FSRA"), the General Code of Conduct for Authorised Financial Services Providers and Representatives (published under the Financial Advisory and Intermediary Services Act 37 of 2002, "FAIS Act"), and the fair-dealing and disclosure obligations of the National Credit Act 34 of 2005 ("NCA"). It further anticipates the incoming Conduct of Financial Institutions Bill ("COFI Bill"), which will codify TCF as a statutory conduct standard, and Reset's operations are structured to remain compliant as COFI is progressively brought into force.

2. Legislative and Regulatory Framework

This Policy is developed with reference to, and must be read together with, the following legislation, regulatory instruments and industry guidance, as amended from time to time:

- Financial Sector Regulation Act 9 of 2017, which establishes the Twin Peaks regulatory model and confers on the FSCA its market conduct mandate, including the power to enforce TCF outcomes;
- Financial Advisory and Intermediary Services Act 37 of 2002 and the General Code of Conduct for Authorised Financial Services Providers and Representatives, 2003 (as amended by Board Notice 194 of 2017 and subsequent amendments);
- National Credit Act 34 of 2005 and the National Credit Regulations, 2006, including the affordability assessment requirements in Regulation 23A and the reckless lending provisions in sections 78 to 84;
- Consumer Protection Act 68 of 2008, insofar as it applies to the fair marketing, disclosure and supply of services to consumers;
- Protection of Personal Information Act 4 of 2013 ("POPIA"), governing the fair and lawful processing of client personal information;
- Financial Intelligence Centre Act 38 of 2001 ("FICA"), insofar as client identification and due diligence processes must be conducted fairly and without unfair discrimination;
- The FSCA's Treating Customers Fairly framework and associated guidance notes, and the six TCF outcomes referenced in section 3 below;
- The Conduct of Financial Institutions Bill (COFI Bill), which will, once enacted, place TCF outcomes on a statutory footing applicable to all financial institutions; and

- Reset's internal Risk Management and Compliance Programme ("RMCP"), Credit Policy, Complaints Policy and Conflict of Interest Policy, which operationalise TCF at a process level.

> *This Policy is reviewed at least annually, or sooner if there is a material regulatory change (including the coming into force of the COFI Bill), to ensure Reset's TCF framework remains current.*

3. The Six TCF Outcomes

Reset structures its conduct risk management around the six outcomes that clients should experience when dealing with the Company:

1. Outcome 1 — Culture and Governance: Clients can be confident they are dealing with a company where fair treatment of customers is central to the corporate culture, from the Board down.
2. Outcome 2 — Products and Services: Products and services marketed and sold are designed to meet the needs of identified client groups and are targeted accordingly.
3. Outcome 3 — Disclosure: Clients are given clear information before, during and after the point of sale, and are kept appropriately informed.
4. Outcome 4 — Suitable Advice: Where advice is given, it is suitable and takes account of client circumstances.
5. Outcome 5 — Performance and Standards: Products perform as clients have been led to expect, and service is of an acceptable standard.
6. Outcome 6 — Claims, Complaints and Changes: Clients do not face unreasonable barriers to lodge a complaint, switch product, submit a claim, or change the terms of an existing arrangement.

4. Governance and Accountability

4.1 Board and Senior Management Responsibility

The Board of Directors bears ultimate responsibility for embedding a culture of fair treatment throughout Reset. TCF outcomes are considered at Board and management level as part of strategic, product and risk decision-making, and are not treated as a peripheral compliance exercise.

4.2 Role of the Head of Compliance

The Head of Compliance is responsible for monitoring adherence to this Policy, reporting TCF management information to the Board, coordinating TCF training, and escalating material conduct risk issues to the Head of Legal and the Board.

4.3 Role of the Key Individual

The Key Individual appointed under FSP 53772 is responsible for ensuring that representatives are fit and proper, adequately trained on TCF principles, and supervised in accordance with the FAIS Act and the General Code of Conduct.

5. Products and Services (Outcome 2)

Reset designs its consolidation loan products with reference to the needs, risk profile and repayment capacity of its target client base of government employees remunerated via PERSAL and other payroll systems. Product design and any material amendment thereto is assessed against the following criteria before roll-out:

- the product is appropriate for the identified target market and its typical financial circumstances;
- pricing, fees and interest rates are structured transparently and comply with the maximum rates and fee caps prescribed under the NCA and its regulations;
- affordability is assessed for every client in accordance with Regulation 23A of the National Credit Regulations before an agreement is concluded; and
- the product does not create an unreasonable risk of over-indebtedness, having regard to Reset's obligations under sections 78 to 84 of the NCA (reckless credit).

6. Disclosure and Transparent Communication (Outcome 3)

Reset provides clients with clear, accurate and timeous information at all stages of the client relationship, including pre-agreement quotations, the credit agreement itself, statements of account, and any notices issued in connection with default, debt review or termination. All client-facing documentation is prepared in plain language in accordance with section 64 of the NCA and Reset's Language Policy and Procedure, and is made available in the official languages Reset supports.

Marketing and advertising material is reviewed for compliance with the General Code of Conduct and the NCA advertising standards before publication, so that it is not misleading, does not create unrealistic expectations, and fairly represents the cost and nature of the product offered.

7. Suitability (Outcome 4)

Where any representative of Reset provides advice, as defined in the FAIS Act, that advice must be based on an appropriate analysis of the client's needs and financial circumstances, and must be recorded in accordance with the record-of-advice requirements of the General Code of Conduct. Representatives may not recommend a product that is unsuitable for the client's circumstances in order to meet a sales target or other internal incentive.

8. Service Standards and Product Performance (Outcome 5)

Reset maintains defined service level standards for the processing of applications, the issuing of statements, the handling of client queries, and the administration of payroll deductions. Operational performance against these standards is monitored by management and reported to the Head of Compliance, who escalates systemic service failures for remedial action.

9. Fair Access to Complaints and Fair Treatment on Default (Outcome 6)

Clients are entitled to lodge a complaint, request debt review, or query any aspect of their account without being subjected to unreasonable barriers, and without being penalised or treated less favourably for having done so. The handling of complaints is governed in detail by Reset's Complaints Policy, which must be read together with this Policy.

Where a client falls into arrears or applies for debt review, Reset deals with the matter fairly and in accordance with the process, notice and timing requirements of the NCA, including sections 86 and 129 and the associated debt review regulations, and does not use termination or collection powers as a means of circumventing a client's statutory rights.

10. Training, Monitoring and Reporting

All staff and representatives receive induction and ongoing training on TCF principles as part of Reset's Risk Management and Compliance Programme. The Head of Compliance monitors TCF outcomes through the complaints register, service metrics, credit bureau data, debt review statistics and periodic file reviews, and reports material findings to the Board at least quarterly.

11. Breach, Escalation and Review

Any staff member who becomes aware of conduct that may result in unfair treatment of a client must report the matter to the Head of Compliance without delay. Confirmed breaches of this Policy are addressed through Reset's internal disciplinary process and, where required, reported to the FSCA and/or the National Credit Regulator.

This Policy is reviewed at least annually by the Head of Compliance and approved by the Board, and is updated on a material change in law, regulatory guidance, or Reset's business model, including the group's transition from Reset Technology Solutions (Pty) Ltd to Reset Solutions (Pty) Ltd.

12. Enquiries

Questions regarding this Policy may be directed to the Head of Compliance:

Contact Point	Detail
Entity	Reset Solutions (Pty) Ltd (Reg. No. 2015/095722/07)
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FSP Number	53772
NCR Registration	NCRCP 18699