



PROFUSION
UNDERWRITING MANAGERS (PTY) LTD.

TCF Policy

Updated July 2023

Contents

A. Who is Profusion?	2
B. What is Treating Customers Fairly (TCF)?	2
C. Our commitment	2
The Six Outcomes	2
Outcome 1 – Principle of Culture & Governance	2
Outcome 2 – Principle of Product Suitability.....	3
Outcome 3 – Principle of Disclosure	4
Outcome 4 – Principle of Suitable Advise	5
Outcome 5 - Principle of Performance and Service in line with expectations.	6
Outcome 6 – Principle of complaints, claims and changes	6
D. Fulfilling our commitment to TCF and Achieving the Outcomes	7
1. Financial Products & Services	7
2. Promotion & Marketing	7
3. Advice.....	7
4. Point of Sale.....	7
5. After Sales	7
6. Complaints Handling	8
7. Roles and Responsibilities of our Employees in treating our customers fairly	8



A. Who is Profusion?

Profusion Underwriting Managers (Pty) Ltd (PUM) is an authorised financial services provider (FSP No 53071) and we operate in accordance to the provisions of the FAIS Act. We are authorised to provide advice and intermediary services on Personal Lines and Commercial Short Term Insurance, Long Term Insurance, Pension Fund Benefits, Short-term and Long-term Deposits, Structured Deposits, Investments, Forex Investments and Health Services Benefits.

B. What is Treating Customers Fairly (TCF)?

Treating Customers fairly was introduced by the Financial Services Board where all FSP's are required to implement and incorporate the business operational principles into the daily business operations in order to ensure that all clients are treated fairly and with respect. In addition, TCF ensures fair outcomes for customers throughout the life-cycle. TCF will benefit consumers and suppliers by;

- Restoring Consumer Trust
- Improving consumer and market confidence
- Ensuring that FSP's manage their market conduct correctly and for the clients benefit

C. Our commitment

We are committed to TCF and it is an integral part of our business and client services. Our dedication to TCF and client service will ensure that our policy holders and brokers will be confident in the service and advice we give. Our core values have been determined to ensure that our TCF policy is incorporated into our business operations and in line with the guidelines as set out by the Financial Services Conduct Authority. The implementation ensures that we uphold our commitment to treating all customers with respect and fairly. We have ongoing product, procedures and company policy training to all staff to ensure that all required levels of service are always delivered. PUM instituted a full commitment to TCF and **introduced its first TCF Policy in July 2023**. The document is a living document and is altered and updated on a regular basis to ensure full commitment and compliance to TCF.

The Six Outcomes

Outcome 1 – Principle of Culture & Governance

Clients are confident that they are dealing with FSP's where the fair treatment of clients is central to the FSP's culture

As a new company, we have not been exposed to any client complaints, however, we have gone to great lengths to incorporate TCF into every facet of our business in the planning and implementation of our operational structures.

- **TCF and how should we treat our clients?**

Our clients will be the life of PUM and we believe that our clients should be treated with fairness, transparency and with the aim to build long term relationships based on Trust and Confidence. This will be delivered to our clients by our staff, management and outsourced suppliers. Any Representative or person that has any contact with any PUM clients, will be trained on our TCF commitment and understand what TCF is and the importance of TCF.

TCF will be constantly reviewed by PUM management based on clients experience i.e. Compliments, complaints and feedback from clients and brokers to ensure that we are constantly on the forefront to ensure that we follow TCF

How and why do we treat our customers fairly?

1. Capture and monitor any complaints received



2. Discuss compliments to better our service offering
 3. Constantly review products offered to ensure that we offer market related and competitive products. These products are always designed with TCF as the core focus on development.
 4. Ongoing analysis of our scripting and communication with clients. We will use our clients claims experience, complaints and compliments to frequently update our scripting documents to ensure that products are explained to clients in details and in easy to understand plain English so that the client has more trust in us from underwriting, from the first point of contact and to ensure that this continues throughout the clients experience with PUM.
 5. We will ensure that all interactions with our clients from schedules to any telephonic discussions to any written communications are clear and succinct so that our clients can have confidence that we are communicating with transparency which will build an atmosphere of trust and communication.
- **If you are your own client, would you be happy with the way you are treated?**
Our focus will be client centric and if I were to be a client of PUM, would I be happy with the treatment received.
 - **Do you and your co-workers talk about the treatment of clients, and do you have a unified approach?**
As discussed above the staff management and outsourced suppliers, anyone who may have contact with our clients will be trained on our commitment to and our policy on TCF.
 - **How do we currently comply with section 2 of the GCoC?**
We comply with Section 2 of the GCoC as follows:
 1. We have implemented a TCF policy since 2023
 2. We have established a full training department which continually trains our staff on company policies and products to ensure that all dealings with clients is always fair and with due skill, thus ensuring that the client is always advised correctly to get the product that serves their needs and is in the interest of the client.
 3. All staff have to complete an annual declaration of honesty to reinforce the importance that all financial services must be rendered honestly and fairly.
 4. All staff are trained in accordance to legislation and all Regulatory exams complied to, thus ensuring that the integrity of the financial services industry is maintained and upheld.
 - **Do you do a due diligence on other businesses before contracting with them?**
As per legislation we will not commence business with any FSP that does not meet the requirements of the FSCA and FAIS. We will complete full due diligence on all suppliers.

Outcome 2 – Principle of Product Suitability

Financial services & products rendered to clients are designed to meet the needs of clients.

The majority of clients will be through dealership channels and this market is predominantly first time buyers, they do not understand the implications around insurance. Profusion Nucleus is designed with that client in mind, not only did we create a simple and easy to understand product, but our scripting and our policy documents/schedule will be clear on the TCF outcomes and we will explain all detail of the cover and the terms and conditions in great detail, in laymen's terms.

Products where PUM offer solutions, i.e. personal lines category and commercial insurance e.g. where the client only requires household and car insurance, there is agreement between the parties as to what specific service will be rendered. This agreement is voice logged because it clarifies to the client what the service is that will be rendered to the client and it limits the potential liability PUM may face under FAIS if there should be a claim which falls outside of the agreement between the parties.



Any agreement between PUM and the client at this stage is of critical importance, because it lays the foundation of everything that follows in the process towards addressing the client's needs. To avoid any future misunderstanding it is important to record this agreement. Such an agreement serves a double purpose as it could offer peace of mind to the client and it offers protection to PUM at the same time. This agreement forms the basis of the contractual arrangement between the parties, section 20 of the FAIS Act places a statutory duty on the FAIS Ombud to pay due consideration to this contractual relationship between PUM and the client. Such an agreement offers clarity to the client and the Ombud as to what service was promised and it offers protection to the provider at the same time.

Do you understand your clients, their financial situation and their financial needs?

Yes, all products offered to clients are carefully explained and discussed BEFORE cover commences so that the client;

- Understands his/her financial obligations
- Understands what is and is not covered
- Understands what policy restrictions are in place
- Understands his financial obligations at claims stage (Excess payments)
- Get confirmation that the product we have explained and offer suit their insurance and financial needs.

Do you understand what the products really do, and how it matches the needs of your clients?

As discussed earlier constant product training will be given to staff/representatives of PUM, this is to ensure that all staff understand what the products offers and what its limitations are. This ongoing training will allow the representatives to clarify;

- Does the client fully understand what these offerings and limitations are and;
- Does this product match their current needs? and;
- Explain to the client that should his future requirements change, it is vitally important that we relook at the product to ensure continued equilibrium between client and product.

Do you do due diligence on all the products / providers you offer?

Yes, all products will be continually revised to ensure that the client's experience of the product is in line with TCF. Profusion has developed a product after conducting comprehensive market research, to ensure that our product is at the forefront of the market, both in premium and excess and we will continue with this commitment on an ongoing basis.

Do you do a suitability analysis in terms of section 8 of the General Code of Conduct (GCoC)?

Yes, our scripting will confirm that the product offers the client what they are looking for, this is determined by;

- Take all reasonable steps to seek and gather all appropriate and available information from the client considering, their financial situation, financial product experience and the client's objective of the insurance product and cover required.
- We conduct a summary and analysis of the product based on the information obtained to ensure that we have identified the correct financial product(s) appropriate to the clients risk profile and financial needs.
- We clearly determine from the client that they understand the advice given and that the client has fully considered whether the product(s) offered are appropriate to their needs and objectives.
- If, for whatever reason, we identify that an analysis is not conducted correctly we will inform the client that a full analysis could not be undertaken, due to this reason the advice given is limited and that the client should take careful consideration to whether the advice is appropriate to his/her needs considering their own objectives, financial situation and particular needs.

Outcome 3 – Principle of Disclosure

Clients receive clear information and are kept appropriately informed before, during & after the time the financial service is rendered.



PUM's schedule will be designed specifically to be customer friendly and easy to read and understand, we will where ever possible use simple plain English. Our Complaints procedure and policy explanations will start early on in the schedule, thus ensuring that the client understands what his/her rights and obligations are. In regards to our scripting for the voice logging underwriting process, you can see that the scripting was designed around the 6 outcomes as the fundamentals of explaining the policy but additionally the clients experience with the agent, the product/scripting training and company spirit put forward is to always respect our customers and give them the best service available, that includes taking their time to explain the policy and its terms correctly and need establishment to ensure that this policy is what the client wants.

Do you use clear explanations of the products when talking to your clients?

Yes, our scripting is a detailed explanation of the product and all the terms and conditions of the product. Our schedule will mirror our focus on TCF and transparency and will be displayed in a clear, simple and easy to understand format.

Do you keep customers informed of the processes and the info required by the service providers?

All underwriting and risk information is gathered from the client during the underwriting process and customers are fully informed of

- All requirements – Inspections, Security, Restriction in drivers;
- Terms and conditions – Allowed Drivers, any conditions on the policy
- Client's obligations – Pay Premium, Excess applicable, change of information etc.

Do you guide the clients about the info required by product suppliers?

Full explanation and contact information is given to the client to fully understand what information is required, this will be echoed in the policy schedule and in the welcoming sms's we will send to the client.

How do you disclose information in terms of section 7 of the GCoc?

All information will be disclosed to the client in terms of section 7 of the GCoC by means of our disclosure notice which will be prominently displayed early on in our schedules

Outcome 4 – Principle of Suitable Advise

Where clients receive advice, the advice is suitable & takes account of their circumstances.

Once again this outcome is dealt with during our scripting but the full customer needs analysis is done with the broker who compares a number of different products to the client and agree on the most suitable product. Profusion confirm information with the client that will ensure that we have offered the client the most suitable product from our side, Excess Buyback offers, car hire etc.

Did you conduct a suitability analysis in terms of section 8 of the GCoc?

Yes, all products offered to clients will be carefully explained and discussed BEFORE cover commences so that the client;

- Understands his/her financial obligations
- Understands what is and is not covered
- Understands what policy restrictions are in place
- Understands his financial obligations at claims stage (Excess payments)
- Get confirmation that the product we have explained and offer suit their insurance and financial needs.

Did you check the client's needs against the recommendations?

- Yes, during the underwriting stage our scripting will confirm that the product offers the client what they are looking for, this is determined by;
- Taking all reasonable steps to seek and gather all appropriate and available information from the client considering, their financial situation, financial product experience and the client's objective of the insurance product and cover required.



- We will conduct a summary and analysis of the product based on the information obtained to ensure that we have identified the correct financial product(s) appropriate to the clients risk profile and financial needs.
- We will clearly determine from the client that they understand the advice given and that the client has fully considered whether the product(s) offered are appropriate to their needs and objectives.
- If, for whatever reason, we identify that an analysis is not conducted correctly we will inform the client that a full analysis could not be undertaken, due to this reason the advice given is limited and that the client should take careful consideration to whether the advice is appropriate to his/her needs considering their own objectives, financial situation and particular needs.

Does your record of advice comply with the GCoC and contain all required disclosures?

Yes

Do you consider all requirements relating to replacement products?

Yes, during the underwriting there are a number of additional products which are offered to the client during underwriting stage which ensure that the client has the option to decide on how the product best suits him/her, his/her needs and his/her financial situation, these include but are not limited to;

- Excess Options, we offer the client options for excess buyback and excess waiver
- Car Hire
- Additional Extra's Cover
- Home Contents
- Building
- Portable possessions

Outcome 5 - Principle of Performance and Service in line with expectations.

Clients have products that perform as FSP's told them it would & the service is at an acceptable standard & what they expect.

Profusion will be continually revising their products in the market, Profusion Nucleus was developed to be an affordable simple insurance that clients can understand. In addition to the simplicity of the product the value added benefits allow the client to tailor the product to suit his current situation and needs and gives him the opportunity to change the product as their life situation changes.

Do you check product performance before you recommend it to your clients?

Yes, as discussed above PUM will be constantly analysing our products based on customer feedback and experience to ensure that the product offered is the best offering we can give the client.

Is the service provided by product suppliers to clients after contracting stage satisfactory?

This will be monitored closely and changes will be implemented to correct any shortcomings.

Do you give feedback to product suppliers about their products and services?

PUM will give constant feedback to suppliers and will update the SLA's as needed.

Outcome 6 – Principle of complaints, claims and changes

Clients do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint

Please see enclosed complaints procedure and documentation which clearly explains and defines an improved methodology in the approach to complaints, clients have a defined process to follow and are made aware of timelines which are in accordance to TCF. See enclosed TCF Policy and Complaints procedure document.



When you provide after-sales services, is it easy for clients to contact you for assistance?

Yes, we will aim to answer 95% of our incoming calls within 10 seconds. PUM will invest a great deal into our telecommunications systems and IT systems to ensure that all clients are assisted immediately. These processes will be managed and monitored on an ongoing basis.

Do you make it a priority to assist clients who have complaints?

Yes, all complaints will be dealt with as a matter of importance, the aim is for our complaints procedure to address any complaints faster than the prescribed guidelines.

Do you help clients when they contact product suppliers for any service after contracting?

PUM will have a holistic hands on approach to our clients and we will control all dealings with our clients to ensure that all our TCF commitments are met, additionally all service providers will have to sign SLA's with PUM to ensure that all levels of required service required by PUM is adhered to.

D. Fulfilling our commitment to TCF and Achieving the Outcomes

- We ensure the achievement of outcomes through our procedures, training & monitoring.
- We will follow the FAIS General Code of Conduct
- We will provide clients with appropriate after sales information and service
- We will adhere to our Conflict of Interest policy in dealing with clients
- All employees will be trained and will receive ongoing training to deal with our clients and will be committed to maintaining high standards of service.
- Our staff will not be incentivised in a way which encourages them to deal with our clients unfairly.
- Clients will always be informed of what to expect from our relationship.
- We will ensure ongoing communication and training with our product suppliers to ensure that all employees understand their products and services.

1. Financial Products & Services

Training by service providers will be conducted with all employees to ensure understanding of the product and how it would meet specific clients' needs.

2. Promotion & Marketing

Product information is provided to the clients through clear communication that is not misleading and is appropriate to the particular clients.

3. Advice

Where advice is provided, all employees will be trained to provide advice that is appropriate and in line with GCoC by completing a full analysis of the client's needs.

4. Point of Sale

Clients will be advised of the differences in products offered as well as all information pertaining to individual products including policy restrictions, requirements and limitations to enable the client to make an informed decision.

5. After Sales

A dedicated client services team will ensure that the products provided to clients remain appropriate and that the service given to our clients is of the highest standard at all times.



6. Complaints Handling

All employees will be trained in our Complaints Policy and Procedure. This Policy & Procedure is in line with legislation and sets out specific time lines that a complaint should be dealt with to guarantee the client's complaint is dealt with timeously and fairly:

- We will handle all complaints in fair and impartial manner.
- Each complaint will be reviewed as to how we can improve on our service and products to continuously improve the levels of service provided.
- We will ensure that complaints are dealt with in accordance with our policy and within the required time frames to ensure the client receives the best possible service.
- All Department Managers will understand and will be trained on the relevant processes to drive this through to their employees ensuring consistent practice throughout the company.
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7. Roles and Responsibilities of our Employees in treating our customers fairly

- Advising the customer on a product which is correct for their needs
- Disclose, on an on-going basis, all relevant material information
- Treat similar situations in the same manner to ensure fair treatment across all customers
- Maintain full and accurate record of all customer information and interactions
- Correctly understanding the individual customer's current requirements and acting accordingly
- Considering the available product options that we have available and explaining these to the customer in a manner that he will understand
- Advise the customer of any additional product needs that the customer might have which we currently do not offer – to ensure that we are aware of product needs and changes
- Effective management of complaints ensuring that all complaints received are accurately, efficiently and securely recorded.

