



**CRATOS ASSET
MANAGEMENT**
INNOVATIVE WEALTH CREATION

TREATING CUSTOMERS FAIRLY POLICY

CONTENTS

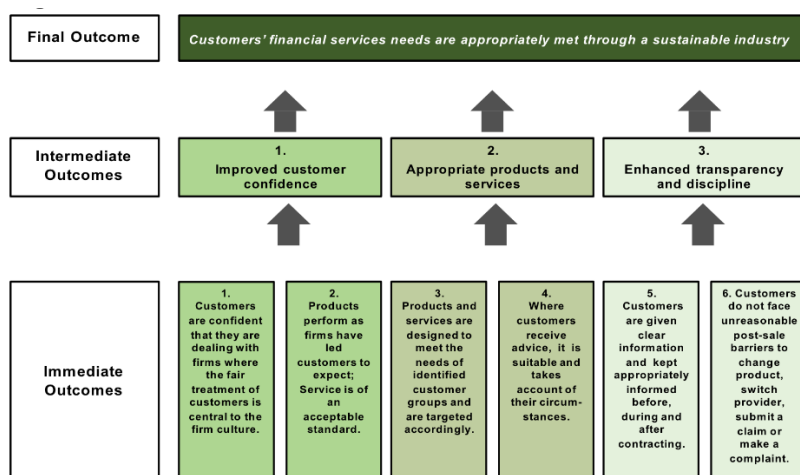
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INTRODUCTION

1. Cratos Asset Management Pty Ltd (The “FSP” or “CAM” hereafter) is a private company registered in the Republic of South Africa under registration number 2014/201224/07. CAM is a registered Financial Services Provider (FSP no. 46597) and SARB-registered institutional investor, offering bespoke investment solutions, across a broad array of asset classes, to its private client and institutional client base.
2. As a Financial Services Provider authorized by the Financial Sector Conduct Authority (“FSCA”), CAM offers financial services including Category I and II financial products not limited to but including investment products and options in South Africa, and across global exchanges.
3. CAM’s head office is located at 57 Smits Road, Dunkeld, Johannesburg. The current board members Gary Cahn, Dave Smyth and Desmond Esakov joined the business in 2018/9, joining the existing Key Individual Clinton Banducci. The rest of the team is comprised of portfolio managers, brokers, administrators and support staff.

POLICY STATEMENT

4. CAM ensures clients are at very heart of all that we do. We are fully committed to providing the highest standards of client service and advice.
5. Our customers are our most valuable asset, and our aim is to ensure we deliver a user-friendly, robust, reliable and cost-effective service. As a part of our overall approach we are fully committed to treating our clients fairly and as such we endeavour to meet their expectations of high quality service.
6. Our Treating Customers Fairly (TCF) policy is centred around the guidance provided (by the Financial Sector Conduct Authority (FSCA) and our External Compliance Officers. This ensures we consistently deliver fair outcomes to our clients, and take responsibility for the firm and staff (at all levels) providing an enhanced service quality to clients, based on a culture of openness and transparency. As a firm, we take the requirements of the FSCA seriously, in particular, the requirement to treat customers (clients) fairly.
7. The FSCA has outlined six key outcomes, which are central to the TCF initiative:
 - 7.1. **Outcome 1:** Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture.
 - 7.2. **Outcome 2:** Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.
 - 7.3. **Outcome 3:** Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
 - 7.4. **Outcome 4:** Where customers receive advice, the advice is suitable and takes account of their circumstances.
 - 7.5. **Outcome 5:** Customers are provided with products that perform as the firm have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.
 - 7.6. **Outcome 6:** Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.



8. Figure 1 Regulatory Framework: We have set out above how we aim to ensure these principles are embedded in our approach and culture to dealing with our clients

OUR SERVICE

9. We ascertain the appropriateness of the requested service for all new clients prior to accepting an instruction, ensuring it is in line with their knowledge and experience.
10. We continually aim to understand the needs of our clients.
11. We keep our clients fully informed in a clear and fair manner that is unambiguous and not misleading.
12. We ensure our services are delivered with clarity and transparency and do not contain hidden conditions or rely on complex technical definitions.
13. We make certain our clients understand the risks associated with our services.
14. We work hard to ensure that service and risk information remains clear and prominent at all times.
15. In the event that there is a conflict of interest, we will inform our clients as soon as possible once we become aware of it.

OUR APPROACH

16. Our priority is to provide our clients with excellent service, underpinned by quality and choice. We are committed to ensuring our employees, customers and advisers want to use our services, remain with us, and recommend us to their families, friends and colleagues.
17. Our service is shaped our clients' needs and understanding what is important to them. We take responsibility for meeting the needs of our clients and always look for ways to improve the quality of our service.
18. We aim to treat our clients fairly and deliver high quality services, which meet their expectations throughout their relationship with us.
19. We recognise that our employees are critical to delivering a positive client experience and ensuring our customers are treated fairly. Our culture and values encourage and support our employees to deliver this.
20. All of our employees are fully trained in dealing with our clients, and in treating them fairly. We remunerate and incentivise our employees to encourage them to deal with all clients fairly, and to continually find ways to improve.

COMPLAINTS

21. We respond in a timely manner to our customers' and prospective customers' questions and queries, and address any issues or concerns promptly. All customer complaints are dealt with and escalated, as appropriate, and as required by us, in order to meet our obligations to our clients, the regulator and the Ombud.
22. CAM will provide full details of its complaints process on request.
23. CAM's policy is in line with the current guidance from the FSCA, and is in line with the principles that "a firm must pay due regard to the interests of its customers and treat them fairly".

AUTHORITY AND MANDATE

24. The Treating Customers Fairly Policy is approved by way of approved resolution of the CAM Board. The directors are responsible for the adherence to and implementation of this policy throughout the organization.

Sign off



Name: David Smyth
Date: 28 August 2023
Position: Key Individual(s)