



**TREATING CUSTOMERS FAIRLY POLICY**

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## 1. INTRODUCTION

Yard Insurance Limited (hereinafter referred to as Yard) is a cell captive insurer that aims to ensure that it has a strong focus on customer satisfaction. Yard is aware that each cell captive or binder holder is a key contributor in sustaining long-term growth and is determined to provide customer confidence hence our Treating Customers Fairly (TCF) policy is an integral part of that objective.

Considering the growing cell captive market, the staff at Yard has made it their ultimate goal and mission to embody a culture of customer satisfaction and business practices that achieve these outcomes and eventually become an inherent part of all areas within the business. Yard Insurance also needs to demonstrate to the regulators that they adhere to the TCF principles and treat their customers fairly.

Our TCF policy is structured according to the guidance provided by the Financial Sector Conduct Authority (FSCA) to ensure that Yard Insurance consistently delivers fair outcomes to clients. It is the responsibility of Yard Insurance staff to provide an enhanced service quality to clients, based on a culture of openness and transparency. Apart from any legislative or regulatory obligations, treating cell captives and clients fairly is a business imperative.

## 2. YARD INSURANCE LIMITED CORE VALUES

- Yard strives to provide customers' satisfaction through quality service within the shortest turnaround time.
- We respect all people and value the differences among them.
- We are accountable, take ownership of our actions and responsibilities.
- We esteem honesty, integrity, and good standing

## 3. THE FAIRNESS OUTCOMES

Yard Insurance will strive to comply with and embed the TCF fairness outcomes in accordance to the FSCA requirements viewed from the perspective of the customer. Yard Insurance has adopted across all business practices, governance frameworks and day-to-day processes.

- Outcome 1: Policyholders are confident that they are dealing with an insurer where the fair treatment of policyholders is central to the insurer's culture.
- Outcome 2: Products and services are designed to meet the needs of identified types, kinds or categories of policyholders and are targeted accordingly.
- Outcome 3: Policyholders are given clear information and are kept appropriately informed before, during and after the time of entering into a policy.
- Outcome 4: Where policyholders receive advice, the advice is suitable and takes account of their circumstances.
- Outcome 5: Policyholders are provided with products that perform as insurers 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: Policyholders do not face unreasonable post-sale barriers to change products, switch providers, submit a claim or make a complaint.

## 4. ACHIEVING THE OUTCOMES

Yard Insurance will aim to demonstrate through our behaviours and monitoring that we are consistently treating customers fairly throughout the stages of the product life cycle to which we can contribute. These may include:

## **OUTCOME 1: TCF Culture and Governance**

- Policyholders can be confident that they are dealing with an insurer where the fair treatment of customers is central to the corporate culture.
- Fit and proper requirements for management, audit, risk and compliance requirements, board and committee structures, whistle-blower protection rules, management incentives will always be followed and adhered to.
- Yard Insurance will maintain regular, accurate, reliable data exchange with all binder holders which will enable the Company to analyse management information to identify possible instances of poor customer outcomes and to then mitigate same.

## **OUTCOME 2: Products and Services Design**

- Products and services and their distribution strategies are designed and developed for specific target markets, based on a clear understanding of the likely needs and financial capability of each policyholder.
- Yard has put its clients' needs at the forefront of their processes by using a thorough detailed onboarding process enshrined in the Due Diligence and Onboarding Guides. These Guides ensure that the product, pricing, distribution method and disclosures remain appropriate for the market it is intended for. To this end, policyholders will be placed be protected if they choose to take up a product or service offered on our licenses.

## **OUTCOME 3: Disclosures and Point of Sale**

- Customer engagements on all stages of Client's journey within binder holder and intermediaries/registered FSP relationships are done. Clear, plain and fair communications (including electronic and telephonic) communications that are not misleading and are appropriate to all our clients are provided.
- This will enable clients to make informed decisions about transacting with Yard Insurance Limited and services. Product risks, commitments, limitations and charges shall be transparent at all times.

## **OUTCOME 4: Suitable Advice**

- Yard representatives will always meet the requirements set out in section 7(1) (b) of the FAIS Act and all fit and proper requirements set out in the FAIS Act, including the FAIS product knowledge and competency requirements.
- Strict intermediary agreements have been put in place for all our outsourced intermediaries who shall interact with Yard clients to ensure that they provide advice with a clear understanding of their responsibilities.
- Therefore, where advice is provided, the representatives of Yard are fully equipped to provide advice that is suitable to the needs of the clients concerned, following the objectives of TCF and avoiding conflicts of interest under the FAIS Act.
- In accordance to section 8 of the FAIS Act, Yard will implement due diligence processes prior to contracting with a new intermediary. This is done in order: to ascertain that the independent intermediary and, where applicable, any persons rendering services as intermediary on behalf of the independent intermediary: -
  - have the FAIS product knowledge competency requirements to support the advice process and;
  - that they are licensed as financial services providers and authorised to render financial services in respect of the policies that will be offered.

## OUTCOME 5: Performance Management

- It shall remain a prerequisite to Yard to:
  - Fully utilise the New Deal Committee and its comprehensive onboarding assessment so that that all TCF principles are considered before signing off of material changes to existing products and services and before a new product is launched.
  - Provide clients with ongoing relevant information that is not misleading or constituting misrepresented facts to enable them to monitor whether the product or service continues to meet their needs and expectations,
  - Hold annual reviews on cell facilities and binder holders so that products & services offered remain acceptable and suitable for the target market concerned.
  - Continue to use efficient and tough binder agreements with service level agreements to outsourced business partners to ensure that all service levels are maintained, monitored, improved, and managed in order to maintain customer confidence.

## OUTCOME 6

- Yard is committed to:
  - Provide acceptable levels of service by thoroughly monitoring management information relating to complaints, claims and switching processes to identify any poor customer treatment and to implement corrective measures in order to prevent post-sale transactions or enquiries.
  - Execute suitable channels and open communication lines for customers to easily contact Yard if they have complaints or queries
  - Observe under systematic review all claims and complaint data to ensure that agreed turnaround times and minimum service standards are always met.
  - Encourage and welcome feedback from staff and customers on Yard services and procedures.
  - Honour representations, assurances and promises that lead to legitimate customer expectations. Legitimate expectations shall not be frustrated by unreasonable post-sale barriers.

## 5. FOCUS AREAS

- We will follow the requirements of the Financial Advisory and Intermediary Services Act, 37 of 2002, including all sub-ordinate legislation. Most specifically, the General Code of Conduct for Representatives.
- We will adhere to our Conflict-of-Interest Policy in dealing with policyholders, clients, binder holder and intermediaries/registered FSP.
- We will put management information mechanisms in place that are designed to monitor and measure Yard Insurance performance in delivering the relevant fairness outcomes.
- All our members of staff will be trained to deal with our clients and are committed to maintaining high standards of service.
- Yard staff are not remunerated or incentivised in ways which encourage them to deal with clients in an unfair or biased manner.

## 6. REVIEW

The effectiveness and performance of the TCF Policy shall be reviewed and submitted to the Board for approval on an annual basis.