

TREATING CUSTOMERS FAIRLY POLICY

Registration Number: 2009 / 012374 / 07

Authorised as a FSP Number: 44769

1. Background

Clan Capital's (the "Company") primary value proposition is the value we can add to private client's understanding the key aspects of their wealth management, through exposing them to the benefits of an institutional approach, and providing them with more information on financial planning, retirement planning, investment management, and estate planning.

The FSB's TCF initiative applies to all financial services Provider firms with customers.

2. Policy

The Company, its senior management and staff take their responsibilities under the FSB's regulatory framework including the TCF initiative, very seriously.

It is the aim of the Company to meet the FSB's TCF requirements. The Company has included TCF checks in its Compliance Monitoring Program ("CMP") in order to evidence that it is meeting its obligations under the TCF initiative.

3. Risk-Based and Proportionate Approach

The Company needs to be able to demonstrate to the FSB that it has thought about and documented the implications of the TCF regime for its business.

The Company's services are specifically targeted to individuals with specific reference to their circumstances and risk appetite. Therefore, the Company's approach to TCF is tailored accordingly in the elements of management information, and the CMP used to monitor adherence to the FSB's requirements.

4. Management Information

Appropriate measures with respect to the Company's MI from a TCF perspective include the following:

- Ensuring that all clients receive the same updates and subsequent recommendations given their circumstances and risk appetite; and
- Ensuring that complaints are recorded and resolved in a timely manner

The Compliance Officer will incorporate checks on meeting its obligations under the TCF initiative in the Company's CMP, and this will be approved by the Company's directors/partners.