

## TREATING CUSTOMERS FAIRLY (TCF) POLICY

**DOMISA FINANCIAL SERVICES (PTY) LTD**  
trading as **DOMISA TREASURY**

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### 1. Purpose

Domisa Financial Services (Pty) Ltd, trading as Domisa Treasury (“Domisa”), is committed to conducting its business in a manner that treats customers fairly at all stages of the customer relationship.

This Treating Customers Fairly (“TCF”) Policy sets out how Domisa embeds the principles and outcomes of the Financial Sector Conduct Authority’s Treating Customers Fairly framework into its culture, governance, business processes, and client interactions.

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### 2. Scope

This Policy applies to:

- All directors, key individuals, officers, employees, and representatives of Domisa
- All client-facing, operational, compliance, and support activities
- All customers, including individuals and corporate clients

Domisa operates as a **foreign exchange intermediary**, providing transaction-by-transaction foreign exchange services via authorised dealers.

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### 3. Regulatory framework

This Policy is informed by, and aligned with:

- The **Financial Advisory and Intermediary Services Act (FAIS)**
- The **FSCA Treating Customers Fairly framework**
- Applicable Codes of Conduct and supervisory guidance

Domisa is a licensed Financial Services Provider.

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### 4. Governance and accountability

#### 4.1 Approval

This Policy is approved by the **Key Individuals** of Domisa:

- **Hanno van Aarde**
- **Mark Thorsen**

#### 4.2 Effective date

This Policy is effective from **3 February 2026**.

#### 4.3 Review

This Policy is reviewed:

- **Annually**, and
- **Ad hoc**, where required due to regulatory or business changes.

#### 4.4 Policy owner

Responsibility for maintaining and implementing this Policy rests with the **Key Individuals**, being:

- Hanno van Aarde

- Mark Thorsen

Overall accountability for TCF compliance lies with:

- The Directors
- The Key Individuals
- The Compliance Officer (**James McKeown**)

Domisa's external compliance officer is **Lanell (Moonstone Compliance)**.

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## 5. Domisa's business model (context)

Domisa:

- Acts as a **foreign exchange intermediary**
- Does **not** design or manufacture financial products
- Facilitates foreign exchange transactions via **authorised dealers**
- Operates on a **transaction-by-transaction execution basis**
- Does **not provide regulated financial advice**

Domisa may provide factual information and general market colour, but all transactions are executed in accordance with global FX market conventions and agreed commercial terms.

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## 6. TCF Outcome 1 – Customers are confident that they are dealing with a firm where TCF is central to its culture

Domisa embeds TCF principles through:

- Director and Key Individual oversight
- Formal internal training and guidance
- Ongoing compliance monitoring via internal controls and external compliance support
- A culture of accountability and transparency

TCF responsibilities are communicated to staff and reinforced through:

- Internal policies and procedures
- On-the-job training and supervision
- Support from Domisa's compliance function and external compliance officer

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## 7. TCF Outcome 2 – Products and services are designed to meet the needs of identified customer groups

Domisa:

- Does not design or manufacture financial products
- Facilitates foreign exchange services via authorised dealers
- Offers services to individuals and corporates requiring legitimate foreign exchange services

Domisa's target market consists of:

- Individuals and corporate clients with valid foreign exchange requirements
- Clients who meet regulatory onboarding and due diligence requirements

No retail mass-market investment products are offered.

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## 8. TCF Outcome 3 – Customers are provided with clear information before, during, and after the point of sale

Domisa is committed to providing:

- Clear explanations of transaction mechanics
- Transparent disclosure of applicable fees and charges
- Accurate transactional confirmations

Information is provided:

- Prior to transaction execution

- At the point of execution
- After settlement, where required

Domisa avoids misleading or unclear communication and ensures that information is presented in a manner appropriate to the client's circumstances.

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## **9. TCF Outcome 4 – Where advice is given, it is suitable and takes account of customer circumstances**

Domisa **does not provide regulated financial advice**.

Domisa:

- Provides execution-based foreign exchange services
- May provide general market information or factual explanations
- Does not make suitability recommendations or portfolio advice

Client suitability is assessed on a **transactional basis**, including:

- Client identification and risk profiling
- Transaction purpose and regulatory permissibility
- Compliance with applicable anti-money laundering and exchange control requirements

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## **10. TCF Outcome 5 – Products and services perform as customers have been led to expect**

Domisa seeks to ensure that:

- Transactions are executed accurately and efficiently
- Services are delivered in accordance with client instructions
- Any issues or discrepancies are addressed promptly

Domisa monitors operational performance and addresses errors, delays, or misunderstandings where they arise.

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## **11. TCF Outcome 6 – Customers do not face unreasonable post-sale barriers**

Domisa ensures that customers do not face unreasonable barriers after transacting, including:

- Clients may **switch between banks or authorised dealers** at any time, without penalties imposed by Domisa
- Clients may **terminate their relationship with Domisa** and close accounts without unreasonable delay
- **No exit or termination fees** are charged by Domisa
- Post-transaction support is available where clients require assistance

Where issues arise relating to:

- Transaction execution
- Settlement delays
- Errors or misunderstandings

Domisa will assist clients by:

- Explaining the transaction
- Liaising with the authorised dealer or bank on the client's behalf, where appropriate

Complaints handling is governed by Domisa's **Complaints Resolution Policy**, which is available on Domisa's website.

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## **12. Monitoring, complaints, and corrective action**

Domisa:

- Maintains a formal complaints process
- Monitors complaint trends
- Takes corrective action where issues are identified

Complaints data is used to:

- Improve processes

- Address root causes
- Enhance customer outcomes

Domisa is comfortable evidencing its complaints handling and corrective actions to regulators where required.

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### **13. Communication and availability**

This Policy:

- Is communicated internally to relevant staff
- Is available for regulatory inspection
- Supports Domisa's broader compliance and customer protection framework

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### **14. Conclusion**

Domisa is committed to ensuring that fair customer outcomes are achieved throughout the customer lifecycle, in a manner that is proportionate to its business model and consistent with regulatory expectations.