

TREATING CUSTOMERS FAIRLY POLICY

September 2025

1. INTRODUCTION

B2B Prime Services Africa (Pty) Ltd (a subsidiary of B2B Prime Services EU Limited) (referred to herein as “we”, “us” or “B2Prime ZA”) is a licensed Financial Service Provider authorised and regulated by the Financial Sector Conduct Authority of South Africa (“FSCA”) with FSP license no. 54191 (“the Act”).

Since 2014, the FSCA has adopted the Treating Customers Fairly (TCF) approach. TCF is an outcomes based regulatory and supervisory approach designed to ensure that regulated financial institutions deliver specific, clearly set out fairness outcomes for financial customers. Regulated entities are expected to demonstrate that they deliver the following six TCF Outcomes to their clients. The six TCF Outcomes are as follows:

Outcome 1: Culture and Governance

Our clients must be confident that the fair treatment of clients is central to our corporate culture.

Outcome 2: Products and Services

The products and services marketed and sold to clients must be designed to meet their needs and be targeted accordingly.

Outcome 3: Information and Disclosure

Clients are provided with clear information and kept appropriately informed before, during and after point of sale.

Outcome 4: Suitability of Advice

Where advice is given, it is suitable and takes account of customer circumstances.

Outcome 5: Product Performance and Service Standards

Products perform as we have led customers to expect, and service is of an acceptable standard and as they have been led to expect.

Outcome 6: Post-Sale Changes

Clients do not face unreasonable post-sale barriers imposed by firms to change products, switch providers, submit a claim or make a complaint.

The purpose of this Treating Customers Fairly Policy (the “Policy”) is to set out how we embrace each of the six TCF Outcomes.

2. CULTURE AND GOVERNANCE

- 2.1. Implementation of the TCF outcomes requires a top-down approach, and so the board of directors has adopted these outcomes.
- 2.2. Our market conduct is regulated by the Financial Sector Conduct Authority, and the issuance of CFDs is regulated by the Financial Markets Act, 2012. To ensure fair outcomes for clients, we require compliance with regulations at each level.
- 2.3. Our business strategy always considers possible implications on the fair treatment of clients. TCF implications and outcomes must always be explicitly considered during the approval of new business projects.
- 2.4. The unfair treatment of clients will not be tolerated and significant consequences will follow for staff and management that do not adhere to our TCF requirements.

3. PRODUCTS AND SERVICES

- 3.1. Services are defined in our agreements or terms, to which clients agree when opening their accounts.
- 3.2. We ascertain the appropriateness of our services for each new client prior to opening their accounts, as part of our onboarding process, ensuring it is in line with their knowledge and experience.
- 3.3. We strive to continuously improve our products and services, as well as the client experience when using such products and services.
- 3.4. We ensure that clients have read our risk disclosure statement so that they are aware of the risks involved when using our services.

4. INFORMATION AND DISCLOSURE

- 4.1. We must assess the clarity, appropriateness and fairness of information and disclosures provided to clients in respect to our services. The information and disclosures must be signed off by a designated senior employee before any distribution.
- 4.2. Any inaccurate, unfair or misleading information provided to clients must be escalated to the board of directors and mitigating steps must be taken as soon as possible.
- 4.3. Regular reviews must be done regarding product information and disclosures which are already in circulation to make certain that they remain accurate, clear and appropriate for identified clients.
- 4.4. Any suggestions or complaints received from either a client, intermediary or staff member regarding product information must be seriously considered.
- 4.5. We will provide clients with relevant information and disclosures on an ongoing basis subsequent to contracting with the client. This information and these disclosures must be provided through appropriate channels and clients must be informed regarding any changes to products in a

timely fashion in order to allow sufficient time for the clients to make informed decisions.

4.6. Employees must be appropriately and adequately trained to provide clients with accurate non-standard information.

4.7. Client information held by us must always be accurate and up-to-date, and clients should be able to contact us through a number of channels in order to receive fast and accurate product information and disclosures.

4.8. We must keep accurate, secure and retrievable records of product information and disclosures supplied to clients, as well as any other relevant interactions.

5. SUITABILITY OF ADVICE

5.1. Clients are dealt with on an execution-only basis and we will not make personal recommendations or advise on the merits or suitability of purchasing, selling or otherwise dealing investments or executing particular transactions, their legal, tax, accounting or other consequences or the composition of any account or any other rights or obligations attaching to such investments or transactions.

5.2. No employee shall purport to assume the role of a financial advisor, and any advice given shall not be given by our authority.

5.3. Clients should bear in mind that merely explaining the terms of a transaction or Financial Instrument, or its performance characteristics does not itself amount to advice on the merits of the investment.

6. PRODUCT PERFORMANCE AND SERVICE LEVELS

6.1. We will take steps to mitigate situations where environmental, regulatory or economic developments impact the extent to which our services do not meet reasonable client expectations.

6.2. We must continuously monitor and act on feedback, complaints and suggestions received from clients or other parties.

6.3. We must ensure that appropriate steps are taken to rectify situations where products and/or service standards are not performing as clients have been led to expect.

7. POST-SALE CHANGES

7.1. Our clients must be informed in advance of any changes that may be made to their products should circumstances change, as well as any important limitations.

7.2. Clients must always be provided with clear and understandable reasons as to why a product change request may be declined.

7.3. Reasons for our refusal of client withdrawals must always be due to legitimate business or regulatory concerns. By default, clients should be able to withdraw funds at any time and for any

reason.

7.4. All decisions regarding complaints are to be objective, consistent, and without any conflicts of interest. Responses to complaints should be followed up to ensure client satisfaction and fair treatment.

7.5. Our complaints handling process must remain consistent, and fair compensation must be provided if a client is prejudiced by unfair treatment.

7.6. Complaints must be analysed in order to identify potential risks of mis-selling and to assess the appropriateness of the firm's products and services for the clients concerned

7.7. Once a complaint has been received, we will keep the client informed of progress made and when responding to a complaint, we must provide clear and understandable reasons for the response with supporting evidence when required.

7.8. If we decline to provide redress to a client, we must provide information on what steps can be taken to have the decision reviewed.

7.9. The relevant employees who deal with complaints must be adequately equipped and must take TCF principles into account.