Part of Supergroup

Treating Customers Fairly Policy (Super Money SA Limited)

Version 1

February 2026

Super Money SA (Pty) Limited
1 Waterview Close
Century City
Cape Town
South Africa

Co Reg No.: 2022/614959/07

Super Money SA (Pty) Ltd. Part of Super group

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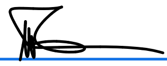
1. POLICY ADMINISTRATION

Policy Details	
Policy Owner	Compliance
Policy Level	Policy
Level of Approval	Board of Directors
Frequency of Review	Annually or if any material legislative or operational changes occur

Revision Date	Document Version	Summary of Changes	Author
February 2026	V1	Creation of Document	Compliance

This Policy has been approved as follows:

Position/Structure	Document Version	Signature and Date of Approval
Licensed Entity Board Director	V1	 Anthony Prissman (Feb 25, 2026 16:35:31 GMT+2)

2. PURPOSE

Super Money SA (Pty) Ltd is committed to conducting its business in a manner that places the fair treatment of customers at the centre of its culture, strategy, and operations. Treating Customers Fairly ("TCF") is an integral part of how Super Money SA (Pty) Ltd designs products, communicates with customers, delivers services, and manages customer relationships.

The purpose of this Policy is to:

- Embed the principles of Treating Customers Fairly into Super Money's culture and operations.
- Ensure that customers experience fair outcomes when engaging with Super Money's products and services.
- Align Super Money's practices with applicable regulatory and conduct standards.
- Provide a framework for identifying, monitoring, and mitigating risks that may result in unfair customer outcomes; and
- Promote accountability for TCF across all levels of the business.

This Policy is structured in accordance with the Financial Sector Conduct Authority (FSCA) TCF framework and supports the achievement of fair outcomes for all customers.

3. SCOPE OF APPLICATION

This Policy applies to:

- All products and services offered by Super Money SA (Pty) Ltd.
- All stages of the customer lifecycle.
- Directors, Key Individuals, Officers, Employees, Contractors and Representatives
- Third-party service providers, including wallet providers, exchanges, custodians, and technology partners, where their activities impact customer outcomes.

4. REGULATORY FRAMEWORK

This Policy is informed by:

- The Treating Customers Fairly (TCF) framework as promoted by the **Financial Sector Conduct Authority (FSCA)**.
- Applicable financial services, consumer protection, and gambling regulatory requirements.
- Super Money's internal governance policies, including the Conflicts of Interest Policy and Complaints Management Framework.

5. THE SIX TREATING CUSTOMERS FAIRLY OUTCOMES

Super Money SA (Pty) Ltd is committed to achieving the following six TCF outcomes, viewed from the perspective of the customer:

5.1 Outcome 1 – Fair Customer Culture

Customers are confident that they are dealing with a provider where the fair treatment of customers is central to the company's culture.

Super Money SA (Pty) Ltd promotes a culture of integrity, transparency, and accountability, supported by governance oversight and performance management structures.

Super Money:

- Promotes ethical behaviour and customer fairness as core values.
- Includes TCF responsibilities in performance expectations; and
- Ensures senior management sets the tone for fair customer treatment.

5.2 Outcome 2 – Product and Service Design

Products and services are designed to meet the needs of identified customer groups and are targeted accordingly.

Super Money SA (Pty) Ltd ensures that products are developed with due consideration to customer needs, risks, and suitability, and that customers are not exposed to inappropriate or unfair outcomes.

Super Money SA (Pty) Ltd:

- Considers customer needs, risks, and vulnerabilities during product design and review.
- Ensures products are not structured in a manner that unfairly disadvantages customers; and
- Regularly reviews products to confirm ongoing suitability.

5.3 Outcome 3 – Clear Information

Customers are provided with clear, accurate, and appropriate information before, during, and after engaging with Super Money SA (Pty) Ltd.

Super Money SA (Pty) Ltd:

- Ensures marketing and promotional material is not misleading.
- Communicates terms, conditions, and risks in plain and understandable language; and
- Makes key information easily accessible to customers.

5.4 Outcome 4 – Suitable Advice and Service

Where advice or service is provided, it is appropriate to the customer's circumstances and needs.

Super Money SA (Pty) Ltd ensures that employees and representatives are appropriately trained and competent to deliver services responsibly and fairly.

Super Money SA (Pty) Ltd:

- Ensures customer interactions are conducted responsibly and professionally.
- Trains staff to identify customer vulnerability and potential harm indicators; and
- Avoids practices that may exploit customer behaviour or lack of understanding.

5.5 Outcome 5 – Products Perform as Expected

Products and services perform as customers have been led to expect, and service standards are of an acceptable level.

Operational processes, controls, and monitoring are implemented to ensure consistent and reliable service delivery throughout the customer relationship.

Super Money SA (Pty) Ltd:

- Delivers products and services in line with customer expectations and contractual commitments.
- Monitors operational performance and customer outcomes; and
- Takes corrective action where service failures are identified.

5.6 Outcome 6 – Fair Complaints Handling

Customers do not face unreasonable barriers when submitting complaints, and complaints are handled in a timely and fair manner.

Super Money SA (Pty) Ltd maintains a documented Complaints Management Framework that ensures complaints are:

- Acknowledged promptly
- Investigated objectively
- Resolved fairly and without undue delay
- Escalated where necessary

Super Money SA (Pty) Ltd:

- Maintains a clear, transparent, and accessible complaints process.
- Handles complaints fairly, consistently, and within defined timeframes; and
- Uses complaint data to identify trends and improve customer outcomes.

6. ROLES AND RESPONSIBILITIES

The Board of Directors and Senior Management of Super Money SA (Pty) Ltd will:

- Oversee the effective implementation of the TCF framework.
- Ensure TCF considerations are integrated into strategic decisions; and
- Allocate appropriate resources to support fair customer outcomes.

The Compliance Function of Super Money SA (Pty) Ltd will:

- Monitor adherence to this Policy.
- Provide guidance and training on TCF requirements; and
- Report material TCF risks and breaches to senior management.

The Employees and Representatives of Super Money SA (Pty) Ltd will:

- Treat customers fairly in all interactions.
- Escalate potential TCF risks or customer detriment; and
- Comply with this Policy and all related procedures.

7. MONITORING AND MANAGEMENT INFORMATION

Super Money SA (Pty) Ltd monitors TCF effectiveness through:

- Customer complaints and dispute trends.
- Customer feedback and engagement metrics.
- Operational and conduct risk indicators; and
- Internal reviews and audits.

Management information is used to identify areas of improvement and prevent customer detriment.

8. BREACHES OF THE POLICY

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment, and may expose Super Money SA (Pty) Ltd to regulatory and reputational risk.

9. REVIEW OF THE POLICY

This Policy will be reviewed at least annually, or sooner if required due to regulatory changes, business developments, or identified TCF risks.

10. APPROVAL

This Policy is approved by the Board of Super Money SA (Pty) Ltd and is effective from the date of approval.