

Treating Customers Fairly Policy

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1. Introduction

FXGT.com is a brand name used and operated by GT IO Markets (Pty) Ltd, a registered company in South Africa, with registration number 2015/059344/07 and registered address at Aurora Drive, Liberty Life Building 21, Office 125, 1st Floor Umhlanga, 4301 Kwa-Zulu Natal South Africa, licensed and regulated by the Financial Sector Conduct Authority under the FSCA FSP Number 48896. (the “**Company**” and/or “**FXGT.com**”).

The Treating Customers Fairly (TCF) initiative is a key component of the Financial Sector Conduct Authority’s broader consumer protection and market conduct mandate. TCF is an outcomes-based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms.

GT IO MARKETS (Pty) Ltd incorporates TCF into the way that we conduct business every day and in the way that we deal with our clients. We may not outsource this responsibility to another party, although our compliance officer may provide guidance and assistance with regards to incorporating TCF into our business.

Our approach to TCF is reflected into the following organisational structures and processes:

Leadership: The Board and management provide direction and monitor the delivery of TCF behaviours and outcomes.

Strategy: The TCF aims are not merely stated vision and values but built into our strategic and business plans.

Decision-making: Decision-making protocols ensure that all decisions that impact on customers are subject to the challenge implicit in our TCF strategy.

Governance and controls: Our governance structures and control mechanisms are designed to cater for TCF considerations and include TCF measurement systems and identification of TCF risks.

Performance management: Our staff and representatives are trained to deliver appropriate TCF outcomes. TCF deliverables form part of our staff performance contracts, and performance is evaluated in terms of TCF competence and expectations.

Reward: Our remuneration, incentive and reward policies take cognizance of fair customer outcomes and ensure that conflicts of interest are avoided.

THE SIX TREATING CUSTOMERS FAIRLY FAIRNESS OUTCOMES

We have incorporated the following 6 TCF outcomes into our business operations:

Outcome 1: Customers are confident that they are dealing with a firm where the fair treatment of customers is central to the firm culture.

- a. Our board sets policies in line with TCF and our management is responsible for taking decisions in line with these policies and communicating these to staff. A standard agenda point at every director's meeting is to discuss TCF matters / complaints.
- b. We aim to put our clients' needs before our own. We have a unified approach towards TCF amongst our staff. We aim to always render financial services honestly, fairly, with due skill, care and diligence and full transparency in the interests of clients and the integrity of the financial services industry.
- c. We carry out a full due diligence on any third-party service providers before contracting with them or recommending them to clients.

Outcome 2: Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.

- All our interactions with clients are via our trading portal, www.fxgt.com;
- We do not make any investment recommendations, nor do we carry out a financial needs and suitability analysis for a client;
- We conduct a thorough analysis of our products (contracts for difference) that we offer clients via our trading portal.
- The clients that utilise our portal are individuals that are looking to specifically trade CFDs.
- Our website, www.fxgt.com makes the relevant disclosures and our market maker/s specifically create CFDs to satisfy our clients appetite to trade CFDs.

Outcome 3: Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.

- a. Our website, www.fxgt.com is offered in plain English.
- b. In the event where a client is unsure, they may reach out to us via our contact page so that we may be of assistance.
- c. Our terms and conditions are provided to clients upon contracting with the client
- d. We are always accessible to clients and easy to reach.

Outcome 4: Where customers receive advice, the advice is suitable and takes account of their circumstances.

GT IO Markets does not render any advisory financial services to clients and would recommend that the client obtain professional financial advice when it comes to the suitability of a CFD to the clients' specific financial needs.

Outcome 5: Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.

- a. Our trading portal is thoroughly tested prior to implementing any changes. We also continuously monitor our platforms' performance to ensure a smooth buying and selling of CFD process.
- b. In the event where we are not comfortable with the CFDs offered on our website as supplied by our market maker, we communicate our dissatisfaction and will proceed to seek an alternative vendor keeping our clients' bests interests in mind.
- c. We have a team who assists and maintain our trading portal in order to ensure that our clients' are able to access it in order to comply with our terms and conditions.
- d. We pride ourselves to deliver excellent customer support be it via email, phone call and/or via our website chat.

Outcome 6: Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

- a. It is easy for a client to communicate with us via our contact email support@fxgt.com or chat live directly with a Customer Support Officer via the website.
- b. We have a complaints resolution procedure in place to address any complaints clients may have.