



## Treating customers fairly policy

This policy is agreed by the Company Directors and any amendments will require approval. The policy will be reviewed annually or as required by business activities and regulatory requirements.

### Introduction

The Company is committed to treating all of its customers fairly. Treating customers fairly (TCF) is about establishing a culture of fairness throughout the business that creates an understanding of the customer's needs and the provision of appropriate products and services.

The Financial Conduct Authority's (FCA) Treating Customers Fairly (TCF) Principle 6 requires a firm to pay due regard to the interests of its clients and treat them fairly. We are fully committed to TCF, and this Policy has been designed to demonstrate the application of TCF during our day-to-day activities.

TCF is embedded throughout the FCA's Handbook and the FCA's six core consumer outcomes are embedded in our firm. These are:

- Consumers can be confident they are dealing with firms where TCF is central to the corporate culture.
- Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and targeted accordingly.
- Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- Where consumers receive advice, the advice is suitable and takes account of their circumstances.
- Consumers are provided with products that perform as firms have led them to expect and the associated service is both of an acceptable standard and as they have been led to expect.
- Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.
- Information is communicated clearly and simply ensuring customers understand our products and services.
- Treat all customers fairly with courtesy and respect, observing the highest standards of integrity and professional standards.

### Our TCF Policy Statement

In all circumstances the Company and its staff must treat all customers fairly. TCF will be a continuing and on-going process within all parts of the Company's business which all staff will be required to follow and embed in all their dealings with the Company's customers at all times. We will act with integrity in everything we do and put our customers at the heart of our business.



## **Our TCF Principles**

- Customers will be provided with clear information and kept appropriately informed before, during and after the point of sale.
- If we give advice to our customers, the advice will be suitable and take account of their circumstances.
- Our level of service and product performance will meet the expectations of our customers as far as reasonably possible.
- We will ensure that there is no barrier for customers to express their requests, concerns or complaints, and will always be responsive to them.
- Products and services will be designed to meet the needs of our customers.

## **Assessing and implementing our TCF Principles**

### **Marketing**

All our financial promotions and marketing materials are reviewed to ensure that they are appropriate for our target audience and are presented in a clear, fair, and non-misleading manner.

### **Sales, Advice, Management**

When providing advice, our advisers obtain a detailed understanding of the customer's needs so that our recommendations are suitable. We ensure that our customers understand the risks involved with any service or product offered and are aware of all fees and charges.

### **Post-Sale Information and Support**

We strive to keep our customers informed pre, during and post contract. Appropriate records are held and can be provided as required on an ongoing basis. We have appropriate capacity for storing and processing information to ensure continuous support. We have no post-sale barriers in place which restrict customers' access.

### **Policies and Procedures**

We have policies and procedures that are relevant to the fair treatment of our customer's, and which also meet FCA requirements. These are (this not an exhaustive list):

- Data Protection Policy
- Vulnerable Customers Policy
- Complaint Handling Procedures

### **Management Information**

The Company's TCF MI are reviewed regularly by directors annually or as business or regulatory needs dictate.



## **Awareness/Training**

We ensure that all advisers and staff are familiar with the TCF Principle and its outcomes. In addition, where applicable, advisers and staff are trained to advise on and adequately explain our products and services. We make sure that all advisers and staff achieve the necessary qualifications and training to carry out their role to the required competence level.

## **Monitoring**

Responsibility for the monitoring of TCF rests with the Company Directors. This ensures that progress is formally monitored regularly. It is the responsibility of the Company Directors to review and interpret MI and to ensure that the TCF outcomes are delivered on a consistent basis. Any TCF issue identified should be duly escalated to the board with recommendations for sustainable remedial action plan as required.

## **Complaints**

Our goal is to provide excellent customer service and complaint handling plays a major part in our TCF policy. We deal with customer complaints fairly and objectively and attempt to put things right as quickly as possible, in accordance with the requirements of the FCA Dispute & Resolution Handbook. All complaints are recorded and monitored, and a root cause analysis performed. All are reported as MI and analysed in senior management meetings.

## **Conclusion**

We encourage a culture of personal responsibility and impress upon all involved with our firm that a good culture is central to the economic health of our firm. We strive to build a strong conduct culture which builds both customer trust and inspires employees. Getting the culture and conduct right is in the interests of our economic strength and our shareholders.

We frequently review our policies, procedures and practices to ensure that TCF remains central to our firm.

We ask our clients to provide us feedback, which enables us to improve our services. The information we gather from our customers is reviewed by the company directors and helps to shape any strategic decisions.