Treating customers fairly policy

Introduction

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.

Our TCF Mission Statement

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 not 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 customers and which also meet FCA requirements. These are (this not an exhaustive list):

- Conflicts of Interest Policy
- Data Protection Policy

- Vulnerable Customers Policy
- Training and Competence Policy
- Financial Crime including Bribery & Corruption & Money Laundering
- Complaint Handling Procedures
- Financial Promotions Procedures

Management Information (MI)

We produce MI to assess our performance against the TCF principles. We ensure that MI is accurate, timely, consistent and relevant to assist the business to make informed decisions in the best interests of our customers. We produce MI reports which are reviewed regularly by senior managers, directors and board members in various meetings.

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. We undertake regular monitoring and assessment of our advisers and staff so that we can ensure their competence.

Compliance

We maintain a Compliance Monitoring Programme which clearly lists areas of responsibilities and the frequency of checks required.

We have a compliance team who is independent and regularly monitors all key areas of regulatory compliance including TCF.

Every year we carry out a TCF Self-Assessment to measure our performance and which highlights areas of improvement

Remuneration

We operate a remuneration model that does not reward on sales performance only, to mitigate sales bias. We reward non-sales staff in a which does not negatively impact on the treatment of our customers. All staff contribute to the firm's overall target. The sale of finance is not incentivised.

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, sometimes formally through customer surveys, so which enables us to improve our service. The information we gather from our customers is reported in our MI and reviewed by senior managers, directors and board members to help shape any strategic decisions.