

## Treating Customers Fairly (TCF)

The Managers of a Financial are committed to ensuring that the FCA principle of treating customers fairly (TCF) is applied in all areas of our day to day business activities. In adopting the TCF principle we recognise that the treatment of our customers is about adding value to the services we offer by aiming to:

- Protect the interests of our customers at each stage of the product lifecycle, from promoting right through to the after-sales service.
- Meet as best we can the unique needs of each customer by offering a transparent, efficient and professional service and constantly reviewing our service to identify areas for improvement.

## In practical terms for the different areas of our business this means:

- Ensuring that promotion material is clear, compliant, jargon-free and appropriately targeted.
- Ensuring that sales staff (both on and off-site) have thorough training on all products the advice on or sell, understand who they aren't suitable for, and are encouraged to challenge product providers where they spot inconsistencies, ambiguities or potential unfairness in the product literature or product features
- Operating sales remuneration systems which assure fairness to the customer as well as customer satisfaction, rather than rewarding sales volumes.
- Finding ways to encourage administration staff to implement TCF in their day to day business activities
- Keeping detailed records of customer instructions and profile/attitude to risk, and of the advice and options given before, during and after sales- to help ensure we treat customers fairly and can deal with complaints that may arise swiftly and fairly.
- Encouraging after sales contract with clients and where appropriate to correct or improve on the services already offered
- Ensure that customer complaints are assessed fairly, promptly and impartially, and in line with the FCA deadlines and rules.
- Encouraging staff to recommend improvements to the services following customer complaints and or monitoring the outcome.
- Offering regular training in the principle of TCF at all levels of the business.
- Regularly monitoring and reporting all the above TCF activity as part of the companies monthly statistic/MI. This is to assess TCF performance across the business and recommended changes where appropriate.
- Ensuring that TCF values are set and communicated by senior management are supported and understood by all staff in the same way.

## When dealing with clients we will:

- Ensure we fully disclose our status and the range of products and services we can offer with any fees payable.
- Undertake detailed fact-finding to enable us to consider the wider and longer-term financial concerns, aims and objectives in addition to your immediate needs
- Use our expertise to recommend solutions which meet your needs, taking care to check details and explain any risks or limitations
- Respond promptly to any queries or concerns which you may have.
- Agree with you what follow up service you may require and ensure that we help you with it.