



TCF Objectives Statement

The Directors and Senior Management 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 fair treatment of our customers is about adding value to the service we offer by aiming to:

- protect the interests of our customers at each stage of the product life cycle, from promotion right through to 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 promotional material is clear, compliant, jargon free and appropriately targeted
- ensuring that sales staff (both on and off-site) have thorough training on all products they advise on or sell, understand who they are and 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 only rewarding sales volumes
- finding ways to encourage non sales 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 a sale – to help ensure we treat customers fairly and can deal with any complaints that may arise swiftly and fairly



- encouraging after sales contact with clients where appropriate to correct or improve on the service already offered
- ensuring that customer complaints are assessed fairly, promptly and impartially, and in line with FCA deadlines and rules
- encouraging staff to recommend improvements to service following customer complaints – and monitoring the outcome
- ensuring that staff are kept up to date with relevant training in relation to competence, data protection and other matters directly affecting the quality of service offered to customers
- offering regular training in the principle of TCF at all levels of the business
- regularly monitoring and reporting on all of the above TCF activities as part of the company's monthly statistics/MI, in order to assess TCF performance across the business and recommend changes where appropriate
- ensuring that TCF values, which are set and communicated by Senior Management, are supported by all staff and understood in the same way