



TREATING CLIENTS FAIRLY POLICY (TCF Policy)

FSP Number 4134

OUR CLIENTS ARE OUR MOST VALUABLE ASSET AND OUR AIM IS TO:

- Protect the interests of our clients at each stage of the advice process, from the very first meeting through to the regular annual reviews
- Endeavour to meet our clients' expectations of high-quality service.

OUR TCF POLICY IS BASED ON THE FINANCIAL SERVICES BOARD'S GUIDELINES AND THE SIX OUTCOMES INVOLVED:

- **Outcome 1:** Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.
- **Outcome 2:** Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly.
- **Outcome 3:** Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
- **Outcome 4:** Where consumers receive advice, the advice is suitable and takes account of their circumstances.
- **Outcome 5:** Consumers are provided with products that perform as firms have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect.
- **Outcome 6:** Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.

OUR COMMITMENT

- We will perform a Full Needs Analysis upfront to ascertain the client's details, financial status and financial needs, unless the client explicitly indicates at the time, that he/she is only interested in a single specific (often risk-based) product (such as life-cover).
- We will prepare a Record of Advice detailing all relevant information required by the client to make an informed decision.
- We will disclose all costs and risks involved with the product being recommended.
- We will make sure that the client understands the Record of Advice and any risks associated with any product recommended.
- When a replacement is recommended, we will compare all material terms of the recommended financial product and the financial product to be replaced to the client and a proper motivation why the replacement is more feasible.
- We will ensure that all Conflicts of Interest are clearly disclosed to enable the client to make an informed decision if applicable.
- We will ensure that all client communications are clear, concise and free of jargon.

- We will ensure that all Authorised Representatives have received training on the products being recommended to ensure they understand to which client group each product is most appropriate.
- We will continuously ensure that all staff members fully understand the Six Outcomes detailed above.
- We will listen to client feedback and will deal with any complaints timeously.
- We will have reviews with clients to ensure that our advice is still applicable to the client's circumstances on an ongoing basis.
- We will ensure that details of financial products recommended are provided to clients so that they are clear on all the features, costs and terms of the financial product.
- We will send the required reports and statements to clients as agreed with the clients.