TREATING CUSTOMERS FAIRLY (TCF) POLICY

POLICY STATEMENT & PURPOSE

BSP Motor Vehicles Ltd has appropriate internal procedures which encourage employees to uphold the FCA principles and TCF outcomes and continually monitor to ensure this is embedded in the culture of our operation.

This policy sets out the procedures followed by BSP Motor Vehicles Ltd to encourage and ensure a TCF culture is embedded in all activities. This policy forms an overview of TCF activity as it is inherent to all other stated policies.

SCOPE

This policy applies to all employees involved in regulated activities within BSP Motor Vehicles Ltd and all its subsidiary and Appointed Representative companies:

LEGAL CONTEXT

The Financial Conduct Authority (FCA) expects authorised firms to conduct their business within the rules and Principles for Business. Principle 6 refers specifically to **Treating Customers Fairly** :

6. Customers' Interests: A Firm must pay due regard to the interests of its customers and treat them fairly'

The FCA provide further guidance on the achievement of this principle through their requirement that authorised firms and Appointed Representatives provide evidence that a TCF culture is at the heart of the business through the achievement of stated outcomes.

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 - Consumers are provided with clear information and 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

APPLICATION

The achievement of customer outcomes is evidenced in the following manner:

Outcome 1- Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.

- Training , competence , monitoring and audit programs embed a TCF culture
- Product and funding partnerships are agreed following careful due diligence on the partner company to ensure TCF continues post sale and in the design of products.
- All attempts are made to treat customers equally whilst recognising specific demands and needs.
- BSP Motor Vehicles Ltd monitors sales and product performance against key performance and risk indicators and industry benchmarks with a view to taking action where risk or customer detriment is identified.

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.

- BSP Motor Vehicles Ltd provide a limited number of regulated product offerings which are related to the demands and needs of our customer base.
- Annual review is conducted to ensure that products offered continue to meet the demands and needs expressed by customers. Review of early settlements and policy claims is conducted to ensure that customers are benefiting from chosen products.

Outcome 3 - Consumers are provided with clear information and kept appropriately informed before, during and after the point of sale.

- All customer communications and promotions are clear, fair and not misleading and provide a balanced view on the product benefits and limitations in order that customers can make an informed decision to purchase.
- Pricing is transparent.
- Customer documentation is reviewed regularly and is designed to inform and advise customer's appropriately and in a timely manner.
- Multi channel communication is utilised to meet differing customer requirements.

Outcome 4 - Where consumers receive advice, the advice is suitable and takes account of their circumstances

- Staff remuneration is such that it avoids conflict with the advice provided to customers through a balanced pay plan.
- The sales process ensures that the individual needs of a client are assessed.
- Change to customer circumstance is confirmed before the continuation of any sales process over a sustained period.
- Sales personnel are trained and competent.
- Monitoring and oversight activities confirm that the sales process continues to meet regulatory requirements including TCF.
- Customer feedback is collected and assessed and influences the forward strategy of the business.

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.

- Management information provides overview of post sale activities including cancellations, claims, complaints, repeat business etc.
- Complaints are monitored and action taken on root cause.
- The sales process ensures that customers have a clear understanding of the products and services they choose to purchase and the involvement of 3rd parties post sale.

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.

- Customers are provided with verbal and documented information on administration activities.
- Partnerships are reviewed in regard to management information which demonstrates TCF.

Implementation

This policy takes effect immediately. All managers should ensure that staff are aware of this policy and its requirements. If staff have any queries in relation to the policy, they should discuss this with their line manager or the Compliance Director.

Retention

This policy will be reviewed periodically and historical records retained for 6 years.