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Treating Customers Fairly Statement
October 2017

Statement

Treating customer fairly (TCF) has always been a key part Treasury Capital Fund Solutions (TCFS) conduct towards its clients and the firm has always strived to work towards positive outcomes. In working towards treating you fairly, our primary objective is to ensure that we put the conduct risk considerations at the very heart of our business.

At TCFS we believe that culture drives behaviour and behaviour drives culture. We seek to promote good behaviour by all our employees, across all aspects of our organisation and to develop a culture in which it is clear that there is no room for misconduct. This would include consideration of behaviours when using social media sites and staff conduct outside of the workplace.

In addition to the behaviours of our employees, we also expects the behaviours of those who do things in our name e.g. outsourced service providers to meet and reflect these behaviours and uphold our standards.

In embracing the 6 TCF principle, TCFS is aiming to:

- Protect the interests of its customers at each stage of the product cycle
- Meet, wherever reasonably possible, the unique needs of its customers by offering a transparent, robust and professional service as well as constantly reviewing its services to identify areas for improvement; and
- Maintain appropriate records to enable TCFS to demonstrate that it has met its TCF obligations.

What the TCF outcomes means to TCFS

TCFS has measured the implications of the FCA's six objectives for TCF and will ensure that, where appropriate, these outcomes are achieved and are fundamental to all of its documentation.

When considering TCF there are a number of guiding principle for firms to focus upon and TCFS' employees must take these into account wherever appropriate:

Product Design – it is essential that Products and services should be designed to meet the needs of identified customers. Furthermore, the products should be targeted at these predefined customers. As part of our decision-making process we ensure that the product or service actually suits the customer base we are designing it for and, just as importantly, remains that way.

Remuneration – although TCFS employees are not commission or bonus driven; TCFS does have a discretionary bonus scheme. TCFS has an responsibility to ensure that employees are considering TCF at all times and that any discretionary bonus payments that may be paid does not influence their decision when considering outcomes for its customers.

Complaint Handling – TCFS has has rigorous procedures to ensure that any complaint is handled in a consistent, prompt and fair manner. All contact details are made available to customers and a free phone number is available.

Outsourced Activities – the FCA has provided detailed guidance where a firm outsources certain activities. TCFS will always recognise that the responsibility and risk for the activity has not been outsourced and that a full regulatory and operational due diligence process of the outsourcing both at commencement and throughout the relationship is in place.

Management Information - TCFS includes management information into its day to day running of the business. This is also accomplished by regular review of key performance indicators and root cause / trend analysis.

Training – Employees receive regular training across all of our business to ensure the information they provide is clear and appropriate before, during and throughout their employment.

TCFS takes its responsibilities as a product provider very seriously and has made every effort to ensure that we identify and managing any conduct risks fairly. TCF is embedded into our culture and reflected in our overall strategy. We remain fully committed to the fair treatment of customers and closely monitor our standards on an on-going basis.