

Policy Statement on Treating Customers Fairly (TCF)

The aim of this statement is to detail the Firm's policy with regard to FSA Principle 6: "pay due regard to the interests of its customers and treat them fairly" and the processes of putting customers' interests at the heart of the business.

General risk assessment: The network is committed to the rules and general principles of the FSA and has close links with its clients.

We have excellent recording and administrative systems and regularly review staff competence. We monitor levels of client care on a regular basis, particularly where there is any evidence of client misunderstanding regarding the services, systems and advice process of our advisers and member firms. Good communication with our customers provides a better understanding of their requirements and ultimately builds trust between customer, network and adviser. The remuneration structure of the network and its member firms are regularly reviewed to ensure that they do not cause any conflicts of interest.

It is our belief that all of the above embodies TCF. On an ongoing basis, we have the advantage of using external consultants who assess our strengths and weaknesses in terms of TCF.

Financial promotions, correspondence and report letters: It is the policy of the network to attempt to make all correspondence and promotions with clients as clear, concise, simple, fair and not misleading. We attempt to make suitability letters as easy to understand as possible.

Advice and sales process: We at all times ensure that advice is appropriate and that due account has been taken of the client's specific profile, needs, knowledge and attitude to risk. When assessing clients' attitude to risk we do our best to ensure that they understand what this means. We always obtain sufficient client information to understand their circumstances, needs and requirements.

By carrying out full and/or regularly updated fact finds, where possible, we structure a programme over time to protect a particular client in terms of their exposure to risks and capitalise on opportunities via good financial planning. We then give our clients the option to act upon these needs or reject them if they wish without pressure to proceed.

We always ensure that we disclose information in a way that is understandable to our clients whilst complying with FSA rules and requirements. This particularly applies to the potential risks clients take when investing.

We always strive to ensure fair treatment.

If any policy exclusions or charges apply, we bring these to our client's attention without prompting and explain their effects either at a client meeting, or where requested in writing.

Flow of information between the network, its member firms and their customers: It is important that customers understand the nature of the services being offered how they pay for them.

The network and its members offer a choice of fees and/or commission and always agree any fee charged before commencement of the work. If additional charges are to be incurred, then this is agreed and explained to the customer before the work is carried out. If the customer wishes to pay for their fee by allowing the retention of any commission payments, such amounts are offset against fees, always refunding any difference to the client. We maintain adequate records to account for client monies and invoices raised.

We are always open with our clients and will, if relevant, communicate with them on any matters that might affect them.

Accurate and timely record keeping: It is important that we keep accurate and adequate records of customer needs and instructions at each stage of the sales process. It is also important that the administration of a client's transaction is carried out efficiently. Accurate records are kept to record all advice and information given and received.

If a customer requires information, we will be open and responsive to their request, replying in a timely manner. We will be mindful of the need to review customer information to ensure its accuracy and to comply with the Data Protection Act. This will enable us to respond fairly to our customers in the unfortunate event of a customer dispute.

At all times we will ensure that client data remains confidential.

Disputes and complaint handling: We already have in place a written complaints procedure that every member of staff has read and understood. It is important that disputes are handled sympathetically and that the network is open and honest about its mistakes. We recognise that a well-handled complaint can prevent a potentially difficult situation escalating and can ultimately retain customer loyalty.

We will be open in our complaint handling procedures and inform customers of areas outside of their complaint, if applicable, where we may have discovered errors of which they may not be aware. A complaint does not automatically lead to compensation, putting the matter right and offering an apology may often be more than enough. Customers readily accept that errors occur and in many cases are gratified that a firm will accept that they are fallible and keen to rectify the situation.

Staff training: We acknowledge that the dealings of all staff affect whether customers are treated fairly. Having members of staff who are adequately trained and mature enough to acknowledge whether a task is outside their expertise is important in this regard. Continuous professional development is important for all members of staff to maintain skills and competence. We also encourage our staff to obtain professional examinations.

Information from insurers/providers: It is important that advisers and their administrative staff understand and consider documentation supplied by insurers, to ensure that they fully understand the features and risks associated with the product being recommended. Advisers should also be in a position to make an informed judgement on the content and opinions expressed in any insurer's/provider's literature.

Keeping up to date: The Apportionment & Oversight Function will continue to monitor further FSA guidance, to ensure that TCF is consistently built into the overall culture of the business, at all times.

Signed on Behalf of the Firm's Senior Management:

Name of A & O Function	
Signature of A & O function	
Date	