

## OUR TREATING CUSTOMER FAIRLY POLICY

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### Background to this Policy

Excellent customer focussed service is central to our culture and business strategy, this policy sets out the ways in which we ensure all customers are treated fairly. Our policy is broken into several key areas as detailed in the paragraphs below. As a business we have focussed on and have been able to build our customer base through referrals and this has meant that great customer service, suitable products and competitive prices have been key since day one.

### Purpose of this Policy

This treating customers fairly (TCF) policy ensures that we:

- Set a culture that is built around the best customer outcomes.
- Provides a framework that all staff can apply when making decisions.
- Meet the guidelines set by the FCA and BVRLA in relation to TCF.

### Six Consumer Outcomes – Financial Conduct Authority

There are six consumer outcomes that leasing brokers should strive to achieve to ensure the fair treatment of all customers.

- Outcome 1: Consumers can be confident 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 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 Culture

We have aimed to create and maintain a customer focussed culture by setting :-

- An ethical approach to decision making and to be applied within processes and controls
- Our ethos is shared internally so that all staff can communication consistent messages to our customers
- We have worked hard to ensure we have a very strong and customer focussed management team
- Our staff are targeted to deliver high standards and fair outcomes
- We have recruited a strong customer service team to ensure the whole journey is a positive one
- We have an end of contract team to ensure that there are no unfair barriers at the end of the contract

### Customer Feedback / Satisfaction Measures

- We use an independent review website that is integrated into our own website and this enabled us to track customer feedback.
- Customers are invited to provide feedback at any stage of the process
- Feedback received is compared with complaints data to improve our processes

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### Customer Complaint Management

- Our complaints process is clearly sign posted on our website and customer can easily submit a complaint online - [View here](#)
- All staff are encouraged to log every complaint received so that we deal professionally with every expression of dissatisfaction and also analyse the themes.
- We have a designated complaints handler in our customer services team who is trained to handle complaints that can't be resolved at the point of initial contact.
- We have worked with an external consultancy to review our complaints processes and professionally train our staff.

### Leadership

- We have two extremely strong and customer focussed senior managers who are responsible for sales and customer services respectively.
- Our organisational structure allows us to observe, provide feedback and coach within the day to day role.
- Calls are recorded for the training and monitoring purposes.

### Internal Audit

- We have an internal second line of defence who audits our orders/calls and provides a weekly report to management.
- We have a weekly management meeting that aims to review and discuss the outcomes of the internal audit results.
- The internal audit results are part of the performance management KPIs for our staff.
- The internal audit results help us improve our processes and are part of our continuous improvement cycle.

### External Audit

- We work with an external compliance consultancy who conduct regular full external audits on our business.
- We are member of the trade body, the BVRLA who also provide a level of audit against their code of conduct.
- We partnership with a number of finance companies whom all require us to satisfy a number of audit requirements.

### Staff Reward

- All sales staff are all employed, have a basic salary plus a performance related bonus. Any bonus paid takes into account performance across a number of KPIs to ensure we treat customers fairly.

### Customer Relationship Management (CRM) / Customer Communication

- We have developed a bespoke CRM system that enabled us to communicate effectively throughout the process. We aim to get in contact regularly and make the next steps extremely clear within the process.