



Treating Customers Fairly Policy

Tony Clarke

Reviewed: 25/8/2022

V5

Legate Group Limited

TREATING CUSTOMERS FAIRLY POLICY

Revision History

<i>Version</i>	<i>Revision Date</i>	<i>Revised By</i>	<i>Section Revised</i>
V1	30/09/2014	T.Clarke	Whole Document
V2	01/10/2017	T.Clarke	Whole Document
V3	27/09/2018	T.Clarke	Partial
V4	07/10/2019	T.Clarke	Minor Changes
V5	25/08/2022	M.McCarthy	Partial

Document Control

<i>Document Owner:</i> <i>T. Clarke</i>	<i>Last Review Date:</i> <i>25/08/2022</i>	<i>Next Review Date:</i> <i>26/08/2023</i>	<i>Unit/Dept:</i> <i>Operations</i>
<i>Latest Review Comments: Added the 6 outcomes.</i>			



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1. TITLE

Treating Customers Fairly Policy

2. POLICY STATEMENT

Legate Group (the "Company") is a commercial investigation company and operates as a small business. As such the Company's policy is designed to be proportionate to the risks and business size. The Company is committed to TCF and this Policy has been designed to demonstrate the application of TCF during the course of Legate Group's day to day activities.

3. PURPOSE

The Financial Conduct Authority's (FCA) Treating Customers Fairly (TCF) initiative is based, primarily, on the obligation set out in Principle 6 that requires authorised firms to pay due regard to the interests of its customers and treat them fairly.

3.1 Background

Whilst Legate Group's direct contact with consumers is limited, the business remains obligated to engender TCF on behalf of its corporate clients, whose customers may be consumers.

Legate Group's 4 cornerstones of professionalism, honesty, respect and transparency is and has been throughout the years, in line with the outcomes stipulated by the FCA's TCF initiative.

FCA core outcomes that Legate Group can affect includes: -

- Ensuring that consumers can be confident that they are dealing with firms where TCF is central to the corporate culture.
- When corresponding with a consumer we will provide clear information and keep them appropriately informed.

3.2 TCF Mission Statement

We will act with integrity in everything that we do and aim to maintain the reputation of our company and that of our client.



3.3 TCF Principles

- Customers will, where possible, be provided with clear information and kept appropriately informed during our appointment.
- Our level of service and performance will meet or exceed our clients' expectations as far as reasonably practical.
- We will treat all of the company's customers and those of its clients with respect, dignity and honesty.
- We will ensure that we co-operate fully with our clients and their customers where they or their customers' express concerns or complaints and will always be responsive.
- 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.

3.4 Linked Policies and Procedures

Legate Group has a number of policies and procedures that are relevant to the fair treatment of our clients and their customers and to adhere to Legate Group's regulatory obligations. These polices include, but are not limited to: -

- Data Protection Policy
- Complaints Policy and Procedure
- Conflict of Interest Policy



- Ethical and Professional Standards Policy
- Compliance Manual

3.5 Management Information (MI)

Legate Group produces MI to assess its performance against the TCF principles and outcomes that it can influence, which is updated and reviewed regularly.

3.6 Compliance

Legate Group regularly monitors all key areas of regulatory compliance including TCF.

Legate Group is a company registered in England (Company Number 5414566) and is authorised and regulated by the Financial Conduct Authority (FRN702800).

3.7 Remuneration

Legate Group operates an appropriate remuneration model for its business and in a way that does not negatively impact the treatment of its clients' customers.

4. RESPONSIBILITY AND SCOPE

This Policy applies to all employees, consultants, agents, contractors, subcontractors, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company.

It is the responsibility of all of the abovementioned parties to ensure that they comply with all aspects of this policy and seek to achieve the TCF objectives and, where appropriate record and report outcomes in the TCF Register.

5. OBJECTIVE

The aim of this policy is to provide a professional service to its clients and a key aim of this is to minimise the risk of generating complaints concerning Legate Group's conduct or behaviour. Complaints and the handling of complaints is a major component of Legate Group's TCF measures. We deal with all complaints fairly, objectively and in accordance with the FCA rules. All complaints are recorded and monitored by the management team in meetings and reported in the company's MI.