



The Bletchley Group Limited
Treating Customers Fairly Policy

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Contents

1 Purpose.....3

2 Review of Policy.....3

3 Responsibilities.....3

 3.1 Management Body Responsibilities3

 3.1.1 Culture3

 3.1.2 Strategy.....3

 3.2 Employee Responsibilities3

4 Treating Customers Fairly.....3

 4.1 Management Information4

 4.2 Conflicts of Interests.....4

5 Recruitment.....5

 5.1 Remuneration.....5

 5.2 Training and Competence5

6 Customer Communications5

 6.1 Financial Promotions5

 6.2 Complaints.....5

7 Breaches of Treating Customers Fairly Policy6

1 Purpose

This policy details how The Bletchley Group Limited (the Firm) will manage its obligations to treat customers fairly and ensure a consistency of approach within the Firm.

The Firm will meet its obligation to conduct itself ethically by properly managing any potential conflicts of interests of its customers.

The Firm is authorised by the Financial Conduct Authority (FCA) and, as such, will act in accordance to the Principles as defined in the FCA Handbook, which will take precedence over the requirements of this policy.

2 Review of Policy

This policy will be reviewed regularly, at least once a year, and amended as considered necessary by the Firm's Management Body in the event of changing circumstances or regulations.

3 Responsibilities

3.1 Management Body Responsibilities

The Management Body of the Firm are responsible for ensuring that the culture of treating customers fairly is embedded within the Firm and is central to the Firm's practices.

3.1.1 Culture

The Firm takes its responsibilities towards its customers seriously and as such has ensured that a culture of treating customers fairly starts with the Management Body and is cascaded down through the Firm.

Fair treatment of customers is central to the behaviour and values of the Firm and senior management are able to articulate what the fair treatment of customers means for their Firm and communicate this to all employees.

3.1.2 Strategy

When determining a strategy the Management Body has aligned its vision and values with the fair treatment of customers at the forefront of the process.

The Firm sets out their objectives and risk appetite to reflect a consistent approach to treating customers fairly and appropriate resources are allocated to ensure that actions that ensure fair treatment of customers agreed at the planning stage are delivered.

3.2 Employee Responsibilities

All employees are expected to read and understand and accept any policies and procedures that relate to how the Firm expects customers to be treated in order to ensure fair outcomes.

4 Treating Customers Fairly

The Firm has reviewed each outcome and has documented how such an outcome may apply to the business and how it will evidence fair outcomes for its customers.

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

- The Management Body have approved this policy and made it available to employees to ensure that they are aware of their obligations

- Remuneration structures have been designed to discourage behaviour that could result in poor outcomes
- Training has been made available to all employees on understanding TCF obligations
- Complaints will be closely examined to identify any TCF failings and actions taken where appropriate
- Information provided to customers for onward transmission to their customers will be designed to meet the information needs of that customer group

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;

- The firm will take into account the information needs of the underlying customer when developing marketing and distribution strategies for our products and services

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

- Our terms of business does not use 'jargon' and takes the information needs of our customers into account

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

- The firm has permission to give advice and has a robust suitability process in place which is subject to rigorous monitoring

Outcome 5: Consumers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and as they have been led to expect;

- The information provided to our customers regarding our product and service will be sufficiently detailed to ensure that the underlying customer is able to understand how their products/services are performing

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.

- Complaints procedures have been put in place by the Management Body
- There are no onerous post-sale or exit penalties applied where the customer wishes to withdraw or change provider

4.1 Management Information

The Firm must be able to measure the effectiveness of its policies and obligations to treat customers fairly through Management Information (MI). Where deficiencies are noted, the Management Body must demonstrate that they take positive steps to address them and ensure that no customers were disadvantaged.

4.2 Conflicts of Interests

The Firm has implemented a separate Conflicts of Interest policy that sets out how the Firm intends to identify and manage the risks arising from conflicts of interest. Where a conflict is identified as likely to cause a poor outcome for customers, the relevant actions will be taken by the Firm.

5 Recruitment

The Firm's recruitment strategy takes into account the previous conduct and behaviour of potential employees. Where there are indications that a potential employee may have participated in poor outcomes, further references will be obtained and the outcome will be considered in any decision to offer a contract of employment.

Potential employees will be questioned on their experiences of ensuring good outcomes where it is relevant to the role.

5.1 Remuneration

In line with its Remuneration Policy, the Firm operates a remuneration structure that is transparent and recognises the fair treatment of customers.

5.2 Training and Competence

Management make positive behaviours and attitudes towards the fair treatment of customers as central to how it conducts its business and this is encouraged through effective training and maintenance of staff knowledge.

Any training must embed the concept of "Treating Customers Fairly" within the corporate culture and competence assessments should ensure that the concept is fully understood and implemented. Management will have effective controls in place allowing them to identify and act on poor customer outcomes and ensure that good outcomes are encouraged.

6 Customer Communications

In its communications with customers, the Firm does not promise to or imply that they are able to provide services that they are not able or equipped to deliver.

Our communications take into account a customer's information needs and is set out in such a way as to ensure that customers are able to clearly understand the nature of the service that is provided to them by the Firm and the markets in which the relevant regulated entity dealing with that customer operates in.

Customers must be able to fully understand the Firm's terms, conditions and charges therefore the tone and content of the communications will take into account the likely level of understanding displayed by its customers. Similarly, the Firm will apply the necessary procedures to ensure that its customers fully understand all costs and charges that they may incur.

The Firm will communicate with its customers in an open, transparent and easily understandable manner.

6.1 Financial Promotions

All non-real time financial promotions are reviewed and must be signed off before hand by the director to ensure balance and conformity with the Financial Promotion rules, i.e. fair, clear and not misleading.

6.2 Complaints

Customers must be able to understand the Firm's complaints procedure, which must be clear, unambiguous and impartial. The opportunity to refer their concerns to the Financial Ombudsman Service must be clearly stated where the customer is an eligible complainant.

The Firm will ensure that the service offered to a customer is not negatively influenced by a customer's complaint and customers can be assured that their complaint will be investigated fairly and objectively.

All complaints are recorded and the outcomes monitored with management information analysed by the Management Body to identify any endemic issues within the Firm.

7 Breaches of Treating Customers Fairly Policy

Any breaches of the Treating Customers Fairly rules will be recorded on the Firm's breach log in conjunction with its Regulatory Breach procedure.