

Treating Customers Fairly (TCF) Policy

LMIS is firmly committed to a positive compliance culture and to the adherence of the principles of Treating Customers Fairly (TCF) as stipulated by the Financial Conduct Authority (FCA). We aim to ensure that we consistently deliver fair outcomes to our customers and take responsibility for the Company and staff providing a quality service to our customers.

The aim of this Policy is to outline how our business will ensure all of our customers are treated fairly and demonstrate that the fair treatment of customers is at the heart of our business culture.

The TCF Outcomes

The FCA has 11 high level principles of business which apply to all regulated firms. Principle 6 states that “A firm must pay due regard to the interests of its customers and treat them fairly”.

There are 5 TCF Outcomes under principle 6 which the FCA expects firms to have at the core of their firm’s culture. These are:

1. Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture>
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.
3. Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
4. Where consumers receive advice, the advice is suitable and takes account of their circumstances.
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.
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 Approach

The TCF outcomes have been firmly embedded into all aspects of our business, not just our regulated activity.

We will ensure that all of our actions are guided by the TCF outcomes. We recognise that our employees are critical to delivering a positive experience and ensuring that all of our customers are treated fairly. Our culture and values encourage and support our employees to deliver this.

To ensure we are consistently meeting the principles of treating our customers fairly, LMIS commits to the following:

1. All communications with customers are made in an open and transparent manner.
2. We will aim to always meet the needs of our customers and provide them with the best advice on our products and services for each individual's circumstances.
3. We will provide all of our customers with clear, fair and not misleading information on all of our products, allowing them to make an informed decision.
4. All customer facing staff are appropriately trained on the principles of TCF and monitored to ensure that they demonstrated the necessary values and behaviours.
5. We will handle all customer complaints and queries with honesty and integrity.
6. We will use the feedback and outcomes from customer complaints to drive continuous improvement and make the necessary business changes to ensure we are providing the best possible service to our customers>
7. Senior Management and the Board of Directors will take responsibility for ensuring that the principles of TCF are firmly embedded in all areas of the business.
8. The approach taken to managing our staff will ensure compliance with the principles of TCF and we have appropriate procedures in place to handle instances of non-compliance.

Review

This Policy will be reviewed annually and will be updated to reflect any changes in regulation or internal practices.