TREATING CUSTOMERS FAIRLY

The Treating Customers Fairly (TCF) initiative is central to the FCA's expectations of a firm's conduct and it was developed to ensure a fair deal for consumers. The FCA has defined six consumer outcomes, explaining what they want TCF to achieve for the retail client or consumer.

Consumer Outcomes

Outcome 1:

Consumers can be confident that 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 customers 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 both 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.

The Heritage approach to TCF

We at Heritage are determined that in all our dealings with our clients they are treated fairly. This requires us to treat client needs equally with those of our shareholders and staff to achieve a fair result for all. Our approach to the provision of services includes clear contract terms, transparent charging, efficient resolution of client queries or complaints and effective management of any conflicts of interest.

Heritage Capital Management Ltd's policy on Treating Customers Fairly is balancing the customer's needs with the firm's needs, being absolutely clear about what the firm and its services offer, and being transparent about fees and levels of service.

Specifically this requires that:

- Our customers should clearly understand the nature of the services we provide, including our terms, conditions and charges.
- Customers must clearly understand the risks inherent in the markets and securities in which they invest through us.
- We must communicate in an open, transparent and easily understandable manner and have a clear understanding of Customers investment objectives, investment experience, attitude to risk, financial standing and resources.
- We must be clear about the suitability of our recommendations to our customers.
- We will not promise to provide services we are not able or equipped to deliver.
- Training and Competence programs must embed the concept of "Treating – Customers Fairly" within our corporate culture.
- Our complaint procedures must be clear, unambiguous and impartial.
- We must be able to measure the effectiveness of our policies of treating customers fairly.

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