

M & M Mortgage Solutions Ltd

TREATING CUSTOMERS FAIRLY (TCF) POLICY

We, the Directors, Staff and Advisors of M & M Mortgage Solutions Ltd hereby acknowledge our obligation to adhere to Principle 6 of the FSA's Principles for Business i.e. *"That a Firm must pay due regard to the interest of their customers and treat them fairly"*, and in order comply with that Principle, hereby undertake: -

1. In Respect of Financial Promotions & Advertising

- To ensure that the Firm maintains suitable and complaint Procedures / Records for approving and issuing its financial promotions and advertising material.
- To ensure that all such promotions and material are drafted in a manner that is intended to be clear, fair and not misleading to the intended reader/recipient/audience.
- To ensure that such promotions and advertising are correctly focussed on the intended target audience and are regularly reviewed to make certain that they comply with all relevant FSA requirements and those of other Institutions purporting to regulate advertising and media promotions.

2. In Respect of Advice Given and Recommendations Made

- To ensure that all advice given, recommendations made and related sales activity with the customers is all at times appropriate to each customer through adequate fact-finding of the customer's personal and financial background, appreciation of risk and stated objectives.
- To ensure that all advice and recommendations is confirmed to the customer, in writing, in a manner they are likely to understand, avoiding to use jargon and indicating/explaining fully the reasoning underlying that advice and those recommendation, given the customer's background, risk appreciation and objectives
- To ensure that all customers understand that purpose, structure, features, risks and tax consequences of financial services products sold to them and that such products meet their expectations, whilst encouraging those customers to raise queries if they do not understand the product information conveyed to them.
- To ensure that customers' financial affairs are reviewed on a regular basis, commensurate with each customer's individual requirements.

3. In Respect of Staff Training

- To ensure that all staff/advisers are competent in what they do through regular supervision, performance appraisals, assessment of key performance indicators, as well as ongoing training programs in the context of the Firm's established Training & Competence Plan, or otherwise.

4. In Respect of Information Issued by Product Providers

- To ensure that customers understand providers' literature through seeking to explain essential elements and risk warnings contained in such literature in Suitability Reports and ancillary correspondence, as well as in "face to face" meetings.

- To ensure that staff/advisers have an adequate understanding of the financial services products sold through adequate supervision, training and research.

5. In Respect of Accurate and Timely Records/Action

- To ensure that staff/advisers maintain comprehensive and accurate records concerning customers' backgrounds, needs and related advice and recommendations made, whether such records are maintained in "hard" form or through electronic media, or both.
- To ensure that all customer requests are auctioned in a timely manner, through use of an effective diary system accessible to all relevant staff/advisers.

6. In Respect of Disputes/Complaints/Claims

- To ensure that the Firm maintains effective and complaint Complaints Procedures at all times and that all staff/advisers are aware of those Procedures and their responsibilities under them.
- To ensure that staff/advisers understand how to identify, prevent or alleviate "conflicts of interest" arising between the Firm and its customers or between one customer and another.
- To ensure that complaints received are monitored to identify any particular patterns or underlying trends in the staff/advisers dealings with its customers in order to address and eliminate the cause of such patterns/trends.
- To ensure that adequate Professional Indemnity Cover is maintained within FSA requirements, to meet customers' legitimate claims.

7. In Respect of Information Dissemination

- To ensure that the customers are aware of the services they are provided with through regular review and contact with those customers and ensure that all members of staff/advisers are aware of their responsibilities and job parameters, who they report to, and the overall structure of the Firm and its governance.

8. In Respect of Remuneration Policy

- To ensure that all remuneration paid by the Firm to its staff/advisers/agents is not solely dependent on sales volume but takes into account primarily the quality of the work of each party, their overall performance, and behaviour towards both their colleagues and the customers.

9. In Respect of Management Information

- To ensure that efficient focussed management information arising out of the Firm's overall activities is compiled and presented in a manner to enable the Firm's Directors and staff/advisers to demonstrate adherence to this Policy, and to submit such information, where requires, to the Regulators, in compliance with relevant Rules, Principles and Guidance.

10. In Respect of the FSA's Initiative on TCF

- To ensure that customers can be confident that they are dealing with a Firm of Independent Financial Advisers and Mortgage Advisers where fair treatment of customers is central to the established business culture.
- To ensure that the design, structure and content of products and services marketed / sold to customers meet their stated objectives and are suitable for their needs.
- To ensure that customers are always provided with clear information and are kept appropriately informed before, during and after the point of any sale.
- To ensure that customers receive timely and appropriate advice and that the advice is at all times suitable for, and takes account of, their circumstances, needs and risk profile.
- To ensure that customers are advised on, recommended and provided with, products that perform in a manner the advisers has led them to expect, and any associated services provided by the advisers are of an acceptable standard, given those expectations.
- To ensure that customers, at no time, face unreasonable post-sale barriers posed by the advisers to freely change products, switch providers, make a complaint or submit a claim.
- To ensure that this Policy and the monitoring of its Undertakings is reviewed at least annually.