

Legate Group Limited
Treating Customers Fairly Policy
30 September 2018

1. Purpose

- 1.1 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.
- 1.2 Legate Group Limited ("the Company") is fully 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.

2. Background

- 2.1 Whilst Legate Group's direct contact with consumers is limited, the business remains obligated to engender TCF on behalf of its corporate clients, whose customer 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: -

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

3. 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.

4. TCF Principles

- 4.1 Customers will be provided with clear information and kept appropriately informed during our appointment.
- 4.2 Our level of service and performance will meet or exceed our clients' expectations as far as reasonably practical.
- 4.3 We will treat all of the company's customers and those of its clients with respect, dignity and honesty.
- 4.4 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.

5. 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

6. 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.

7. 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).

8. 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.

9. Complaints

Legate Group aims 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.

10. Responsibility for Compliance and Scope of Policy

10.1 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.

10.2 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.

This policy has been approved & authorised by:

Name: Tony Clarke
Position: Director
Date: 30/09/2018

Version Control:

Version	Date	Approved	Review Date
V1	30/09/2014	01/10/2014	30/09/2017
V2	01/10/2017	31/10/2017	30/09/2019
V3	27/09/2018	27/09/2018	30/09/2019