

Treating Customers Fairly & Consumer Duty Statement

Reference: PRIN 6 / Consumer Duty (parallel application)

The FCA's six TCF outcomes and the four Consumer Duty outcomes do not legally apply to the article 60C body-corporate exemption product we sell - but they describe the standard we hold ourselves to anyway.

The six TCF outcomes

- Outcome 1. Customers can be confident they are dealing with a firm where the fair treatment of customers is central to the business.
- Outcome 2. Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups.
- Outcome 3. Customers are provided with clear information and are kept appropriately informed before, during, and after the relationship.
- Outcome 4. Where customers receive advice, the advice is suitable and takes account of their circumstances.
- Outcome 5. Customers are provided with products that perform as firms have led them to expect, and the associated services are of good quality.
- Outcome 6. Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

The four Consumer Duty outcomes

- Products and services - designed to meet the needs, characteristics, and objectives of the target market.
- Price and value - products provide fair value: the price is reasonable relative to the benefits provided.
- Consumer understanding - communications equip customers to make effective decisions.
- Consumer support - customers receive the support they need.

What we measure

Every quarter the management team reviews:

- The proportion of applications declined and the reasons.
- The proportion of loans repaid on time, early, late and defaulted.
- Forbearance requests received, granted, declined, and outcomes.
- Complaints received, complaint root causes, complaints upheld.
- Vulnerable customer flags added, removed, and treatment outcomes.

If a metric moves in the wrong direction we change something - product features, communication, process - and re-measure.