

POLICY STATEMENT:

TREATING CUSTOMERS FAIRLY

Introduction

Treating Customers Fairly (TCF) is a regulatory approach introduced by the Financial Sector Conduct Authority (FSCA) to focus on the fair treatment of customers. Futurity has adopted and applied the TCF principles to their day to day business operations. In adopting TCF we prioritise the fair treatment of our clients and ensure that all our services are value adding and aligned to the principles of the TCF legislation. It is part of our business culture and service ethic to ensure that our team delivers excellent customer services continuously.

Our Service Promise

As a trusted, Independent Financial Services Provider, Futurity Wealth Management has structured its business to ensure optimal client outcomes are achieved by providing:

- A rigorous advice process which is supported by a financial needs analysis and client risk assessment
- Suitability of advice
- Strong governance and operational support
- Strict data protection and client confidentiality policies

Our Key Investment Principles:

1. Client Individuality

Our philosophy is to implement solutions appropriate to client's circumstances, needs, goals, objectives and risk appetite.

2. Process Driven Solutions

Our solutions are outcome based and follow an in-depth investment process to ensure that the selected portfolio best suits a client's investment needs and objectives.

3. Asset Allocation and portfolio construction

We believe in an active management approach and use a robust asset allocation methodology to construct our client's investment solutions. Monthly investment management meetings are used to monitor and review performance against benchmarks, with the flexibility to adjust the portfolios if as and when necessary and appropriate.

Portfolios are enhanced by using a combination of passive indices and active fund managers to manage the total expense ratio and transactional costs whilst maintaining flexibility and taking judicious action in stock-picking and effective asset allocation during times of market turmoil.

Fund manager research is a core component of our investment philosophy and is used to ensure portfolios are constructed in a diversified manner and investment styles (value, thematic, momentum, growth, quality) as well as underlying stocks.

This approach reduces and manages risk and volatility in the portfolios to achieve consistent investment returns.

Our investment philosophy is supported by Affinity Capital Management, who assists Futurity Wealth Management in completing fund manager research, model portfolio construction and rebalancing. Quarterly investment committee meetings review the macro economy fund manager performance and are used to ensure all portfolios are positioned to achieve their outcomes.

4. Offshore Investment

We believe that investing offshore should form part of a globally diversified investment portfolio and strategy and be formulated by taking and considering a client's risk profile and outcomes based needs and analysis into consideration.

Futurity has embraced the client centric framework outlined in the six TCF outcomes:

Outcome 1 of TCF: Consumers can be confident that they are dealing with firms where the fair treatment of consumers is central to the corporate culture

- This outcome is the shared approach to client engagement
- TCF objectives have been communicated to all staff and applied to our business objectives
- Ongoing Compliance training is conducted to assess the understanding of TCF
- TCF outcomes are reviewed at our monthly management meetings

Outcome 2 of TCF: Product and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and are targeted accordingly

- Client investment solutions are directly aligned to the advice process
- Products proposed are designed around the client's needs and risk profile
- Ongoing review processes reassesses client's needs to ensure that the solution remains appropriate.



Outcome 3 of TCF: Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale

- Communicating with our clients is the cornerstone of our business model. Clients are kept informed before, during and after contracting with Futurity
- Clients receive information about the products proposed that incorporates product descriptions, risks, costs and rationale, in a clear and transparent manner with the aim of ensuring that clients can make informed decisions
- Clients are updated on market related matters that may have an impact on their investment portfolio

Outcome 4 of TCF: Where consumers receive advice, the advice is suitable and takes account of their circumstances

- A Financial Needs Analysis and Record of Advice is completed when meeting with a client
- Client's circumstances are considered when providing appropriate advice and selecting suitable products
- Through the financial advice process, we assess a client's knowledge and provide all relevant information to ensure adequate understanding of the proposed solution and advice
- Wealth Managers are suitably qualified and have an sufficient knowledge, experience and understanding of the products available to offer suitable advice
- The Wealth Managers attend regular internal and external training sessions to keep up-to-date with product, legislative and industry knowledge.

Outcome 5 of TCF: 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 led to expect

- The advice and investment management processes are designed to ensure that all product solutions are aligned with the client's needs and risk profile
- Regular communication and formal channels to address and resolve queries ensures that clients are satisfactorily engaged with

Outcome 6 of TCF: Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint

- We ensure that clients have easy access to our team of resources
- Any Complaints are recorded and dealt with timeously, and in a formalised process
- Enquiries and other admin related queries are timeously dealt with by our administrators
- Clients are guided and educated on how switches, additions, claim submissions and complaints can be made
- Products recommended are typically flexible and can be adapted in line with client or market circumstances.

Ongoing self-assessment and a review of TCF

We continuously strive to improve our services by:

- Conducting an analysis of each TCF outcome using the self-assessment tool, and considering any regulatory changes that may be applicable
- Identifying improvements within our business operations
- Conducting random file audits
- Conduct client surveys to ensure we meet our client promise