

progeny

**Treating
Customers
Fairly**

February 2022

Progeny is fully aware that customers are the lifeblood of the business and treating them fairly is not just a regulatory tick box exercise, it is at the heart of who we are and what we do.

Treating customers fairly (TCF) is about establishing a culture of fairness throughout the business that creates an understanding of the customers needs and providing appropriate products and services.

To achieve and continually improve, TCF is more than just a policy or regulatory requirement, it is about instilling the right culture and values throughout the business from the very top in company strategy and decision making, down through the Firm in recruitment, reward, staff performance and controls to ensure the right consumer outcomes are achieved.

As a registered financial services provider, we are required to measure our activities against six TCF outcomes that aim to reduce market conduct risk and protect consumers of financial products. The six outcomes are as follows:

1. Consumers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.
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.
3. Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
4. Where consumers receive advice, the advice is suitable and takes account of their circumstances.
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.
6. Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch providers, submit a claim or make a complaint.

We believe that these outcomes are at the core of our business and are demonstrated with our Mission, Vision and Values statements:

Mission Statement:

To be the most trusted professional advisory firm in the UK and beyond.

Vision Statement:

We are greater than the sum of our parts and equipped through our diversity of expertise to deliver sophisticated solutions that meet the complex needs of investors, business, family offices and charities.

Value Statement:

1. Group Wisdom
 - An inclusive, creative and cooperative team that is redefining the industry norms.
 - Ability to engender trust and make decisive, informed and considered decisions based on our diversity of professional expertise.
 - Being a collaborative environment that seeks to encourage everyone to engage and contribute their ideas.

2. Empowering Others
 - Creating opportunities for clients, colleagues and communities.
 - Nurturing talent and professionalism

3. Agility
 - We use technology to eliminate paperwork, improve communications and enrich the relationship between client and adviser.

4. Social Responsibility
 - Committed to making positive change in our industry towards greater transparency, equality, diversity, inclusivity, and democracy.

5. Long-Term Thinking
 - Established for tomorrow's wealth
 - Business strategy built with long-term planning to last beyond ourselves.
 - Investment products that will withstand markets over time.
 - Outstanding custodians of our profession.
 - Always making the right decisions for the long-term benefit of our clients.

Other key TCF commitments

Services and Products:

- Our financial promotions policy ensures that our marketing and sales materials:
 - Are clear, fair and not misleading
 - Support our TCF Policy
 - Comply with corporate standards and relevant product and distribution policies

- Complaints
 - Our goal is to be the most trusted professional advisory firm in the UK and beyond and complaints handling plays a major part in our TCF Policy as we appreciate that things can go wrong occasionally. We deal with complaints fairly and objectively and attempt to put things right as quickly as possible, in accordance with regulation. All complaints are recorded and monitored, and a root cause analysis performed so that we can learn from each one.
 - Customers will not face undue complex procedures when making a complaint and we will always adhere to our regulators compliant handling regulation.
 - We will provide clear information and updates as required by regulation or more frequently where we deem appropriate.
 - We will handle all complaints promptly and fairly with due regard to individual circumstances.
 - We will apply and consider all relevant guidance from the Financial Conduct Authority and Financial Ombudsman Service.

Conclusion

This policy is designed to set out the responsibilities for the fair treatment of customers and demonstrate how Progeny meets and continually assesses how it treats its customers fairly and will be reviewed at least annually.

progeny

London

Leeds

Edinburgh