

Treating Customers Fairly Policy

Introduction

- 1.1 Reach Commercial Finance Limited t/a Leonard Curtis is committed to the fair treatment of customers. Our Treating Customers Fairly (TCF) framework is developed around the core six outcomes set by the Financial Conduct Authority (FCA). By placing our clients at the centre of our business ensures that fair outcomes are achieved.
- 1.2 Staff at all levels are trained with the six outcomes in mind and we promote this culture through our organisation, using a 'message from the top' approach to set the right standards from the offset.
- 1.3 The FCA's six TCF outcomes are derived from their key Principles of Business. The six outcomes are;

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

Outcome 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.

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

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

Outcome 5: 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 been led to expect.

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

- 1.4 Reach Commercial Finance Limited understand that simply learning the six outcomes is not sufficient to demonstrate that they have been effectively embedded into our business culture, below we set out how each outcome is implemented and achieved throughout our business.

2.0 Outcome 1

"Can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture."

- 2.2 Each member of the team understands the importance of fair treatment of customers, our clients are essential to our business model and TCF supports our developing and crystallised relationships with our clients.
- 2.3 We are a developed commercial business and our management team is directly involved with our activities. Monthly meetings are held with TCF as standing, fixed agenda item for discussions.
- 2.4 Employees at Reach Commercial Finance Limited are all regularly trained on the fair treatment of customers and we have a 'tone from the top' mentality, consistently promoting TCF throughout the business.

3.0 **Outcome 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.”

3.1 We ensure any marketing material developed is proportionally targeted to the needs of our clients, for example we do not send material regarding mortgage finance arrangements where the client requires vehicle finance. We make it clear that we are a broker and not a lender of financial products.

3.2 We do not tend to issue financial promotions. Our static website contains information about what we do, as well as generic information relating to some of the types of services which we provide advice on, and some case study examples. It complies with the FCA’s financial promotion requirements set out in the FCA’s Handbook CONC 3. Amendments to the website are signed off by our Compliance Officer prior to issue to certify compliance.

4.0 **Outcome 3**

“Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.”

4.1 The nature of the products and services that we offer are such that we are required to interact closely with all our clients. As part of this process, we become aware of any need to provide further information in a different way.

4.2 The Reach Commercial Finance Limited website holds clear, simple advice on our processes along with how to contact us.

5.0 **Outcome 4**

Where consumers receive advice, the advice is suitable and takes account of their circumstances.

5.1 Reach Commercial Finance Limited acts as an introducer/Broker of finance for our clients. We tailor our introductions specifically based on the needs and suitability from a robust KYC/Fact find process.

5.2 Reach Commercial Finance continues to have an obligation to ensure that any recommendation that we give is suitable given our clients’ individual situations based on the information provided. We use a Suitability Statement, which provide granular detail on the clients’ circumstances, as well as the options we have considered, the final decision, including the rationale behind the decision, emphasising the clients’ circumstances and the suitability of the product selected.


5.3 We conduct regular reviews of the clients, requesting updated data of their circumstances and objectives to ensure the services we provide, remain relevant, adequate and suitable for their needs.

6.0 **Outcome 5**

“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 been led to expect.”

6.2 We provide clear information to our clients. We are ever mindful of non-disclosure risk, for example; if we fail to mention a specific feature of a: Minimum term lease, Agreement Fees or other charges as they become applicable. Reach Commercial Finance Limited uses simple, clear disclosure documents which the client must read, and sign to confirm understanding, prior to commencement of our duties.

6.3 Fact sheets are produced and provided which highlight, in clear intelligible writing, the terms of an agreement and how it is to perform. Reach Commercial Finance Limited have an ethos



of no small print and are as open and transparent to our clients as possible, ensuring full disclosure.

7.0 Outcome 6

“Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.”

7.1 We have in place a complaints procedure and policy in place which comply with the FCA's Regulatory Handbook (DISP) Dispute Resolution section. We apply these standards to all complaints received that fall within the definition of “eligible complainant”. Details of how a client or business can make a complaint is clearly listed on our website, we provide a non-premium rate contact number and allow for electronic communications to be received regarding any dissatisfaction displayed.

7.2 Reach Commercial Finance Limited is a member of the National Association of Commercial Finance Brokers (NACFB) and adheres to a code of conduct.

8.0 Consumer Duty

Under Consumer Duty Reach Commercial Finance Limited act to deliver good outcomes for customers, ensuring :

- customers receive communications at the right time, that they can understand
- products and services meet the need of our target customers
- products and services offer fair value
- customers are given the support they need

Reach Commercial Finance Limited assess and monitor whether we are delivering good outcomes to customers, reviewing our KPIs with additional reporting required for their Board.