



# MOTUS

FINANCIAL SERVICES

TREATING CUSTOMERS  
FAIRLY POLICY



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# 01

## PURPOSE



- 1.1. Motus Financial Services (MFS) has a number of registered Financial Services Providers (FSPs) within the division. The Financial Sector Conduct Authority (FSCA) has implemented the “Treating Customers Fairly” (TCF) approach to regulate the market conduct of FSPs.
- 1.2. MFS is committed to ensuring that the principles of TCF are applied across all business activities within the financial services sphere. Our customers are our most valuable asset and our aim is to ensure we deliver appropriate products and services to our customers. This document is to give the outlines of how our FSPs strive to incorporate TCF within its daily operations.

# 02

## POLICY



- 2.1. TCF is an initiative by the FSCA that seeks to ensure that specific, clearly articulated fairness outcomes for financial services customers are demonstrably delivered by regulated financial institutions.
- 2.2. The following six fairness outcomes are required to ensure the supply of appropriate financial products and services to customers and enhanced transparency and discipline in financial institutions, resulting in improved customer confidence:
  1. *Customers can be confident they are dealing with firms where fair treatment of customers is central to the firm’s culture.*
  2. *Products and services marketed and sold in the retail market are designed to meet the needs of identified consumer groups and 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 provider, submit a claim or make a complaint.*



## 03

# OUR APPROACH



- 3.1 Protect the interests of our customers at each stage of the product life cycle, from promotion right through to after-sales.
- 3.2 Meet as best we can the unique needs of each customer by offering a transparent, efficient and professional service and constantly reviewing our products to identify areas of improvement.

## 04

# IMPLEMENTATION OF TCF PRINCIPLES

## ADVISER AND STAFF TRAINING AND COMPETENCE

- 4.1. We recognise that our employees are critical to delivering a positive customer experience and ensuring our customers are treated fairly. Our culture and values encourage and support our employees to deliver this. We ensure that all our staff and representatives achieve the necessary qualifications and training in order to perform their job functions, provide suitable advice and efficient services.

## COMMUNICATION

- 4.2. All communication with customers will be made in an open and transparent manner that is unambiguous and not misleading.

## CUSTOMER SERVICE

- 4.3. The FSPs under MFS has in place set service standards for our customers so they can be sure of the service level to expect from us. We encourage after-sales contact with customers where appropriate to correct and improve on the service already offered. We strive to ensure that our services are delivered with clarity and transparency.

## SUITABILITY

- 4.4. From the outset, we obtain a basic understanding of each client's individual needs related to the products we offer. All recommendations made to our customers are suitable to their specific requirements as far possible. We provide customers with clear information and advice tailored to their needs to help achieve their goals. We have internal processors which monitor these principles. Our incentives and commission structures, rewards behaviour consistent with the six TCF outcomes.

## MANAGEMENT INFORMATION (MI)

- 4.5. We use certain MI to ensure that our TCF commitment is being met. MI enables management and employees to make informed business decisions in the best interests of our customers (example analysing Quality and Compliance scores, Complaints etc.).

## PRODUCT DISCLOSURE

- 4.6. We provide clear explanations of products that is in no way misleading. All disclosures required by legislation are made in writing.

## ADVERTISING STANDARDS

- 4.7. Our message conveyed via any media platform is clear and "fine print" is kept to a minimum.

## PRODUCT DESIGN

- 4.8. Each product developed by us or our business partners follow diligent assessments. We share the accountability for the fair treatment of our mutual customers. Our products are designed to cater to our customer's needs, limiting risk or exposure. Our products do not have hidden penalties or large upfront costs. Legislation and compliance is considered during the design of our products ensuring fairness and security from the customer's perspective.

## CLAIMS

- 4.9. All claims received are timeously and diligently responded to by dedicated and well trained staff. Our customers are kept updated as to the status of their claims. We strive to achieve a fair outcome on each claim.





## POLICIES AND PROCEDURES

4.10. The FSPs under MFS has in operation policies and procedures designed to manage any conflicts of interest which may arise in our fair treatment of customers.

### THE FOLLOWING LIST IS AN INDICATION:

1. Privacy Policy – We treat customer privacy extremely seriously and have in place a comprehensive policy which complies with all the aspects of the Protection of Personal Information Act.
2. Conflicts of Interest Policy – Any potential conflicts between the company and its customers are identified, recorded on our conflicts register and managed accordingly.

## 05 OUR COMMITMENT

The above related TCF policies and principles are long standing practices throughout the FSPs under MFS. However we acknowledge that TCF is an ever developing and continuous process so we are constantly reviewing our policies and procedures to ensure that TCF remains of paramount focus and importance.

We will always strive to deliver higher quality services which meet the customer's expectations throughout their relationship with us.



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