

# Valu-Trac Investment Management Limited

Authorised and regulated by the Financial Conduct Authority (FCA), registration number 145168.  
Registered in England No. 2428648

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Orton, Moray  
IV32 7QE

## *Treating Customers Fairly Policy*

The aim of this statement is to set out the Valu-Trac Investment Management Ltd's policy with regard to FCA Principle 6: "pay due regard to the interests of its customers and treat them fairly" and the processes of putting customers' interests at the heart of the business.

The Senior Management of Valu-Trac is committed to ensuring that the FCA principle of treating customers fairly (TCF) is applied in all areas of our day to day business activities. In adopting the TCF principle we recognise that fair treatment of our customers is about adding value to the service we offer by aiming to:

- protect the interests of our customers at each stage of the service process from initial contact by the customer right through to dealing with any queries or concerns, and
- meet as best we can the unique needs of each customer by offering a transparent, efficient and professional service, and constantly reviewing our service to identify areas for improvement.

In practical terms, these aims mean that we must:

- ensure that promotional material is clear, compliant, jargon free and appropriately targeted
- ensure that staff have thorough training on all products they advise on, understand who they are and aren't suitable for, and are encouraged to challenge product providers where they spot inconsistencies, ambiguities or potential unfairness in the product literature or product features
- find ways to encourage staff to implement TCF in their day to day business activities
- keep detailed records of customer instructions and profile/attitude to risk, and of the advice and options given before, during and after a sale – to help ensure we treat customers fairly and can deal with any complaints that may arise swiftly and fairly
- encourage after sales contact with clients where appropriate to correct or improve on the service already offered
- ensure that customer complaints are assessed fairly, promptly and impartially, and in line with FCA deadlines and rules
- encourage staff to recommend improvements to service following customer complaints – and monitoring the outcome
- ensure that staff are kept up to date with relevant training in relation to competence, data protection and other matters directly affecting the quality of service offered to customers
- offer regular training in the principle of TCF at all levels of the business
- regularly monitor and report on all of the above TCF activities as part of the company's six monthly statistics/MI, in order to assess TCF performance across the business and recommend changes where appropriate
- ensure that TCF values, which are set and communicated by Senior Management, are supported by all staff and understood in the same way.

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Registered Office:

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