

Consumer Duty Policy

Tackle Finance Limited Consumer Duty Policy

Version: 1.0

Written by Eve Summers – Compliance Manager

June 2023

CUSTOMER
SERVICE
IS NOT A DEPARTMENT.
It IS AN
ATTITUDE.
~UNKNOWN

Consumer Duty Policy

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Consumer Duty Policy

1 Purpose

This policy details how Tackle Finance Limited (the Firm) will manage our obligations to deliver good customer outcomes, treat customers fairly and ensure a consistency of approach within the Firm.

The Firm will meet our obligation to conduct ourselves ethically by properly managing any potential conflicts of interests.

Tackle Finance Limited is authorised by the Financial Conduct Authority (FCA) and, as such, will act in accordance with the Principles as defined in the FCA Handbook including Principle 12.

2 Review of Policy

This policy will be reviewed regularly, at least once a year, and amended as considered necessary by the Firm's Board of Directors in the event of changing circumstances or regulations.

3 Responsibilities

3.1 Board of Directors Responsibilities

The Board of Directors of the Firm are responsible for ensuring that good customer outcomes are achieved under the Consumer Duty for all retail customers and the content of this policy document is adhered to. This includes ensuring the culture of treating customers fairly is embedded within the Firm and is central to the Firm's practices.

Our Firm's Board of Directors comprises of nine Directors.

The Firm has appointed *Eve Summers (Compliance Manager)*, as the Consumer Duty Champion.

3.1.1 Culture

Tackle Finance Limited takes its responsibilities towards customers seriously and as such has ensured that a culture of delivering good customer outcomes starts with the Board of Directors and is cascaded down through the Firm.

Good customer outcomes and the fair treatment of customers are central to the behaviour and values of our Firm and senior management are able to articulate what the Consumer Duty means for our Firm and communicate this to all directors. We deliver this through the three cross cutting rules and four outcomes set out within the Consumer Duty and the six TCF outcomes, alongside our obligations in relation to the Principles for Business and the Conduct Rules.

3.1.2 Strategy

When determining our strategy, the Board of Directors has aligned our vision and values with delivering good customer outcomes at the forefront of the process.

Our strategy sets out our objectives and risk appetite to reflect a consistent approach to delivering good customer outcomes and allocating appropriate resources to ensure that actions that ensure fair treatment of customers agreed at the planning stage, are delivered.

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3.2 Director Responsibilities

All Directors are expected to read, understand and accept any policies and procedures that relate to how the Firm expects customers to be treated in order to ensure they receive good outcomes.

All directors are expected to adhere to the Conduct Rules applicable to their roles, including the rule that states *"You must act to deliver good outcomes for retail customers"*.

In order to achieve this, the Firm will ensure all relevant directors have the required level of knowledge regarding the products and services we distribute.

4 Defining a 'good customer outcome'

Tackle Finance Limited's target market are categorised as Retail Customers with the following common traits:

Our customers are typically prime credit rated business customers who are unlikely to present a specific vulnerability. We accept all customers are susceptible to event driven vulnerabilities.

The typical financial objective of our customers is to acquire assets for business use, or loans for business purposes.

A good customer outcome for our customer base would be: *"To provide customers with the ability to manage their cashflow, and acquire business assets or loans to improve and grow their businesses."*

5 Cross Cutting Rules

Tackle Finance Limited recognises that delivering good customer outcomes will be achieved through adhering to the three cross-cutting rules of Consumer Duty which are to:

- Act in good faith towards retail customers;
- Avoid foreseeable harm to retail customers; and
- Enable and support retail customers to pursue their financial objectives.

6 Consumer Outcomes

Tackle Finance Limited will ensure that it adheres to the four Consumer Duty Outcomes, which are:

1. Products and Services:

We will ensure that the products and services we distribute meet the needs, characteristics and objectives of our customers and perform as they are expected to.

As a distributor of products and services we will:

- Understand the features, benefits and limitations of the products and services we distribute, along with who the target market is and what the distribution channels are, to enable us to sell them in an appropriate and correct manner. Therefore, we must make sure that we have obtained all of the information we need to fully understand and appropriately sell them to consumers.

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- Have appropriate distribution arrangements in place for each product and service that we distribute, which will be in line with guidelines set out by the manufacturer.
- Monitor and review how products and services are being sold to make sure that they are being sold to the identified target market and are distributed in the correct way.
- Share relevant information with manufacturers to support their review of products and services.

2. Pricing and Value:

We will ensure that the products and services that we distribute offer fair value for customers.

We will ensure that:

- Fees are fair and proportionate to the cost of providing or delivering the product or service and that we can justify the value of the fees we charge.
- We review whether there are other charges levied throughout the distribution chain which might mean that the overall cost of the product or service does not provide fair value to the customer.
- We consider whether vulnerable customers may suffer harm as a result of the way that our fees are structured.
- All fees and charges applicable to our products and services are clearly and fully communicated to customers.
- We share relevant information with manufacturers in relation to pricing, including feedback from customers.
- Review any actions taken in relation to pricing and value to make sure that these changes achieve the required outcomes.

3. Consumer Understanding:

We will ensure that we support our customers by helping them to make informed decisions about products and services. Customers will be given the information they need at the right time, and presented in a way that they can understand.

We will:

- Support our customer's understanding by making sure that our communications are likely to be understood by our "average" customer and are provided at the right time, so that they can make properly informed and timely decisions.
- Tailor communications, taking into account the characteristics of the customers who we intend to receive these communications, including customers with characteristics of vulnerability, the complexity of the product or service and the manner in which the information will be communicated.

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- Monitor, test and adapt communications on a regular basis and make sure that where information is unclear, misleading or incorrect, that action is taken to amend them.
- Review any actions taken in relation to customer communications to make sure that these changes achieve the required outcomes.
- Make sure that all fees and charges, including any ongoing charges or exit charges, are clear and prominent in communications with customers.
- Make sure that the protections applicable to products and services or customers, such as the Financial Services Compensation Scheme protection and right of referral to the Financial Ombudsman Service are clearly highlighted.
- Be clear about whether a product is regulated or unregulated.

4. Consumer support

We recognise that customers can only pursue their financial objectives when we provide them with the level of support they need to use the product or service they have bought.

We will provide customers with support channels which allows them to use products and services as expected and enjoy their benefits. This includes:

- Making how and when customers can access support clear to them.
- Providing post-sale support that is as good as pre-sale support.
- Meeting customer's needs, including accommodating customers who are dealing with complex issues, or those who are vulnerable.
- Including appropriate "friction" points in the sales process which can mitigate the risk of harm to a customer and result in good outcomes.
- If a product or service is no longer suitable for customers, make it easy for them to switch to another product or exit.
- Being clear about how they can make a complaint when things go wrong.
- Carrying out reviews of customer support levels on a regular basis and addressing any issues identified in a timely manner.
- Reviewing any actions take in relation to customer support to make sure that these changes achieve the required outcomes.

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7 Treating Customers Fairly (“TCF”):

Treating Customers Fairly (“TCF”) sets out a series of principles that we are required to comply with to demonstrate that we put our customers at the heart of our business.

Under TCF, we should consider the fair treatment of customers throughout the entire customer journey, understand our customers and their needs, ensuring that our business model and strategy takes them into account. We must also put appropriate systems and controls in place to monitor whether our approach to TCF is successful and customers’ needs are being met.

We believe that the TCF outcomes below are relevant to achieving adherence to the three cross cutting rules and four consumer outcomes set out by the Consumer Duty. (Products & Services, Price & Value, Consumer Understanding, Consumer Support)

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

The Firm will ensure that fair treatment is embedded in the culture of the Firm, examples are given below:

- The Board of Directors have approved this policy and made it available to Directors to ensure that they are aware of their obligations.
- Remuneration structures have been designed to discourage behaviour that could result in poor outcomes.
- Training is available to all Directors on understanding TCF obligations. Training is completed at induction and on an annual basis thereafter.
- Complaints will be closely examined to identify any TCF failings and actions taken where appropriate.
- Information provided to customers for onward transmission, will be designed to meet the information needs of that customer group.

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.*

Steps are taken to ensure that products or services meet customer’s needs, and are marketed properly, examples are given below:

- We will take into account the information needs of the underlying customer when developing marketing and distribution strategies for our products and services.
- Products will be reviewed on an annual basis to ensure their suitability to the target market.
- Our distribution strategy will be reviewed annually and updated if required.

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

- Our Terms of Business does not use ‘jargon’ and takes the information needs of our customers into account.
- Customers are given reasonable time to consider information provided to them before signing or committing to anything, and Directors are available to answer any questions which arise.

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

- We do not have permission to give advice and will not be in a position where advice may be inadvertently provided to a consumer.

Outcome 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.*

- The information provided to our customers regarding our product(s) and service(s) will be sufficiently detailed to ensure that the underlying customer is able to understand how their products/services are performing.
- Customer feedback and complaints data will be monitored, and any issues addressed.

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.*

- Complaints procedures have been put in place by the Board of Directors and a copy of the procedure is available at: <https://tacklefinance.co.uk/legal-regulatory/>

There are no onerous post-sale or exit penalties applied where the customer wishes to withdraw or settle an agreement.

7.1 Management Information

Tackle Finance Limited must be able to measure the effectiveness of our policies and obligations to treat customers fairly and deliver good customer outcomes through Management Information (MI). Where deficiencies are noted, the Board of Directors must demonstrate that they take positive steps to address them and ensure that no customers were disadvantaged or suffered harm.

The Board of Directors will monitor the delivery of good outcomes for its customers through specific MI to act as key performance indicators of meeting the Consumer Duty. This MI will be reviewed formally by the Board of Directors on a regular basis at Board meetings as well as informally on a business-as-usual basis. The formal review process will take place within the annual May Board meeting.

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The Management Information reviewed for each Consumer Duty Outcome will include:

Consumer Outcome	Management Information
Product & Services	Customer feedback, Complaint data and Cancellation data
Price & Value	Annual review against all products offered across all funders
Consumer Understanding	Customer feedback and Complaint data
Consumer Support	Customer feedback and Complaint data

Further details of the Product Governance arrangements are documented in the Product Governance Policy.

7.2 Conflicts of Interests

Tackle Finance Limited has implemented a separate Conflicts of Interest policy that sets out how we intend to identify and manage the risks arising from conflicts of interest. Where a conflict is identified as likely to cause a poor outcome for customers, the relevant actions will be taken by the Firm.

7.3 Vulnerable Customers

Tackle Finance Limited has implemented a Vulnerable Consumer Policy that sets out how we intend to deal with vulnerable customers and to ensure that they are treated fairly and achieve good outcomes.

8 Recruitment

Tackle Finance Limited's recruitment strategy takes into account the previous conduct and behaviour of potential Directors. Where there are indications that a potential Director may have participated in poor outcomes, further references will be obtained, and the outcome will be considered in any decision to offer a directorship.

Potential Directors will be questioned on their experiences of ensuring good outcomes where it is relevant to the role.

8.1 Remuneration

Tackle Finance Limited operates a remuneration structure that is transparent and recognises the fair treatment of customers.

8.2 Training and Competence

The Board of Directors make positive behaviours and attitudes towards the delivering of good outcomes central to how we conduct our business, and this is encouraged through effective training and maintenance of Directors' knowledge.

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Any training must embed the concept of the Consumer Duty and TCF within the corporate culture and competence assessments will ensure that the concept is fully understood and implemented. The Board of Directors has effective controls in place allowing them to identify and act on poor customer outcomes and ensure that good outcomes are encouraged.

9 Customer Communications

In its communications with customers, Tackle Finance Limited does not promise to or imply that we are able to provide services that we are not able or equipped to deliver.

Our communications take into account a customer's information needs and is set out in such a way as to ensure that customers are able to clearly understand the nature of the service that is provided to them by Tackle Finance Limited and the markets in which the relevant regulated entity dealing with that customer operates in.

Customers must be able to fully understand our Firm's terms, conditions, and charges therefore the tone and content of the communications will take into account the likely level of understanding displayed by its customers. Similarly, Tackle Finance Limited will apply the necessary procedures to ensure that our customers fully understand all costs and charges that they may incur.

Tackle Finance Limited will communicate with our customers in an open, transparent, and easily understandable manner.

9.1 Complaints

Customers must be able to understand the Firm's complaints procedure, which must be clear, unambiguous, and impartial. The opportunity to refer their concerns to the Financial Ombudsman Service must be clearly stated where the customer is an eligible complainant.

Tackle Finance Limited will ensure that the service offered to a customer is not negatively influenced by a customer's complaint and customers can be assured that their complaint will be investigated fairly and objectively.

All complaints are recorded, and the outcomes monitored with management information analysed by the Board of Directors to identify any endemic issues within the Firm. The Firm's complaints policy can be found here: <https://tacklefinance.co.uk/legal-regulatory/>

10 Breaches of Consumer Duty Policy

Any breaches of the Consumer Duty will be recorded on the Firm's breach log in conjunction with its Regulatory Breach procedure.

The Firm will also inform the regulator as required of any areas identified within the respective distribution chains of other firms which are not or may not be complying with Principle 12 or FCA requirements under PRIN 2A.

The Firm will also consider any further information relating to the Consumer Duty and inform the FCA under Principle 11 where it is deemed the regulator would reasonably expect notice.