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Consumer Duty & TCF Policy Statement

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Purpose

Under the Consumer Duty rules and the Principle for Businesses, including the new Principle 12, the FCA expects firms to take positive action to deliver good outcomes for retail customers. The board of Fleet Solutions Network t/a Simply-Leasing is fully committed to treating customers fairly and we expect good outcomes for customers to be delivered as a natural result of our commitment to the core values that underpin our culture. This statement is designed to demonstrate the application of this during the course of our day to day activities.

Scope

This policy has been adopted by the Board of Directors and applies to everyone involved in our business. For the avoidance of doubt, this includes all officers and beneficial owners of the firm as well as all employees (i.e. permanent, contract, self-employed and temporary staff).

If anyone covered by the scope of this policy statement has any queries, these should be raised with the Managing Director.

Policy Statement

Our customers are our most valuable asset and we are fully committed to treating our customers fairly and ensuring that customers achieve good outcomes and as such we endeavour to meet their

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expectations of high quality service throughout the product lifecycle. To achieve this we will implement a number of measures detailed below:

Design and marketing of suitable products

- Ensure we design products and services to meet the needs of customers in our target market.
- Ensure all products are assessed to ensure there is a reasonable relationship between the price paid for a product or service and the overall benefit consumers receive from the product over time.
- Consider whether our product or service has features that could risk harm for any group of customers, including those with characteristics of vulnerability.
- Ensure that the product and services sold by our distributors are targeted accordingly.
- Ensure we monitor our product value over time and against market and other benchmarks.
- Assess all customer applications to ensure the most suitable and appropriate product is selected based on the customer's credit profile, employment and other relevant circumstances, to reduce the negative impact on the customer credit history and to ensure that the product meets affordability and sustainability tests.

Transparent information and customer understanding

- Ensure appropriate information is provided before the customer enters into any agreement, ensuring the customer fully understand what they are committing to.
- Make sure that any promotional material is clear, compliant, jargon free and appropriately targeted.
- Provide customers with clear accessible literature and product information to ensure that product information can be readily understood by our customers.
- Make our customer journey and those of our distributors is as easy as possible and aimed at getting it right first time.
- Ensure all customer facing employees have thorough understanding of all product features, risks and benefits to be able to pass this information on to the customer

Appropriate advice

- Take reasonable care to ensure any advice that we give to our customers to aid them in their buying decisions is reliable and sound, takes into account a customer's individual circumstances and products meet their requirements.
- Provide ongoing feedback, coaching, developing and training for all our staff.
- Training non-sales staff to implement TCF in their day to day business activities to improve the culture within the businesses.
- Ensure employees 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.
- Keep staff informed of issues identified through monitoring, recording of complaints and dissatisfaction.

Customer support

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- Ensure any interactions with customers, including customers access to information, is consistent throughout the product lifecycle.
- Ensure customers get the support they need, when they need it, that enables them to use and enjoy the full benefits of the products and services they buy.
- Respond flexibly to the needs of customers with characteristics of vulnerability.
- Have a process in place to record any expression of dissatisfaction and complaints and make our complaints process easy for customers to access.
- Make sure customer complaints are assessed fairly, promptly and impartially, and in line with FCA deadlines and rules.
- Keep customer records of all conversations before and during the application and recording relevant information on company systems so we can deal with any complaints that may arise swiftly and fairly.

Confidence in our culture

- Conduct our business with integrity.
- Have processes in place to identify and combat money laundering and fraud.
- Continual monitoring and quality checks through call, case and process monitoring.
- Implement sales remuneration packages that promote the TCF culture and customer satisfaction, rather than awarding sales volumes.
- Have strong ethical values that are evidenced in the workplace.
- Strive to get our customer service right first time and deliver what we promise.
- Empower our staff to ensure any concerns raised by a customer are immediately addressed.

Expectations fulfilled

- Actively encourage customers, distributors and other parties to provide feedback.
- Implement a contact questionnaire with clients after a sales has been concluded to help or improve our products and services.
- Monitor and reporting on all of the above activities as part of the company's monthly statistics/MI, to assess performance and adherence to achieving good outcomes for customers across the businesses including, but not limited to, looking at how customers are behaving, how they're using our products, what they're complaining about, satisfaction surveys and other feedback.

Responsibilities

For the avoidance of doubt, the firm's Directors shall ensure that there is clear allocation of responsibilities for developing and maintaining a fair treatment of customers ethos across the Senior Management team. This shall be documented in job descriptions and shall be a consideration in individual performance reviews.