

## TREATING CUSTOMERS FAIRLY POLICY

(October 2018)

### Introduction

#### Treating Customers Fairly (TCF)

The Treating Customers fairly initiative was introduced by the Financial Services Authority in 2004. It is an outcomes based regulatory and supervisory approach designed to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by regulated financial firms.

The TCF outcomes are as follows:

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

#### Our Commitment to our Customers

Zeal is committed to offering its customers the highest standards of service. The Board of Directors fully supports the Financial Conduct Authority's (FCA) initiative to Treating Customers Fairly and its policy is that it must be evident at all levels of the firm.

Zeal recognises that if employees look after the best interests of our customers and treats them fairly in all aspects of their dealings, both our customers and Zeal will significantly benefit. TCF is an ongoing project which will remain embedded into the Company's culture.

#### Know Your Client

To enable Zeal to offer its Customers the highest standards of service and ensure that the product is appropriate, we will request the following information from them:

- understanding of risks involved;
- attitude to risk;
- previous relevant experience;
- income and savings;

- any other relevant financial circumstances;
- any other relevant information.

Feedback from our clients for any issues regarding the service offered by Zeal will be welcomed so that Zeal can continue to improve it.

#### Staff Training and Awareness

All relevant Company employees (regardless of their seniority) will be given training on a regular basis, to ensure that they both understand and apply TCF.

#### Strategy and Planning

The FCA requires all firms to report the Board of Directors with appropriate Management Information (MI) to ensure customers are receiving fair treatment.

Zeal will review all areas of its business on a regular basis. On an annual basis, The Company will also send a questionnaire to a sample of active customers to help identify any areas of the business where improvements can be made. Reviews will involve the Board of Directors, all Senior Management and any other relevant employees who will report to the TCF Committee which consists of the following persons:

- CEO – Shoaib Lakhany
- Director - Tsui Man Chung
- Head of Compliance/MLRO – Nazeer Datoobhoy

The TCF committee will continue to remind employees of their obligation to ensure fair treatment of customers at all times. Should any employee identify any issues that may need to be addressed, they will be required to notify the TCF Committee immediately (regardless of whether a TCF review is being conducted). Responses will be discussed by the TCF Committee and appropriate action will be taken, if any weaknesses are highlighted.

The complaints register will be reviewed on a periodic basis. If any recurring issues are identified, appropriate corrective action will be taken.

#### Deliberate breach of TCF

Zeal is committed to treating its customers fairly, as evidenced in our documentation. A breach of TCF is regarded as an act of misconduct. Senior Management will take disciplinary action against any employee who has deliberately breached Zeal's TCF requirements.