

Thomas Miller Investment Treating Customers Fairly ('TCF') Policy

Introduction

This document sets out the Policy of Thomas Miller Investment Ltd and Thomas Miller Investment (Isle of Man) Limited (collectively 'TMI') regarding Treating Customers Fairly. TMI is committed to acting at all times in our clients' best interests. In accordance with Thomas Miller Group's values, TMI is committed to delivering excellent client service. Clients are vital to our business and our aim is to deliver a service that exceeds client expectations.

The TMI Boards are clear that fair treatment must be applied to all clients at all times in the course of our dealings with them and on their behalf.

We are focused on delivering the "customer outcomes" as they apply to TMI, namely:

- Our clients can be confident that in dealing with us their fair treatment is central to our corporate culture;
- Our products and services meet the needs of each individual client and are targeted appropriately;
- Our clients are provided with clear information and are kept appropriately informed as long as they remain a client of TMI;
- Where our clients receive advice, the advice is suitable and takes account of their circumstances;
- Our clients are provided with a service which is appropriate and is as they have been led to expect;
- Our clients do not face unreasonable barriers to changing investment manager or adviser, submitting a claim or making a complaint.

In addition, we aim to ensure that TMI staff:

- Are trained and competent to perform their role;
- Have a clear understanding of the importance of TCF within TMI and the importance the respective TMI Boards place on TCF.

Policies & Procedures

The following policies and procedures help TMI to achieve the TCF customer outcomes:

- A TCF Policy that is communicated to all staff and available to all clients on the TMI website;
- When liaising with new clients TMI staff obtain a detailed understanding of the client's investment objectives, their level of expertise and their attitude to risk, this is recorded and reviewed regularly ensuring our products and services remain suitable;
- Staff training includes TCF;
- All financial promotions and marketing literature are reviewed to ensure they are fair, clear and not misleading and are appropriate for the target audience;
- Our Order Execution and Conflicts of Interest Policies are disclosed on the TMI website;
- An internal review is conducted by the TMI Compliance & Risk Team to monitor and review our TCF policies and procedures;
- All client charges are clearly disclosed.

Complaints Management Procedure

Our complaints management procedures are designed to ensure that: the process of complaining is straightforward; our response to complaints is comprehensive and fair; and any right of referral to the Financial Ombudsman Service (UK) or Financial Services Ombudsman Scheme (IoM) is clearly communicated.

On acknowledgement of a complaint, we will send the complainant a copy of the TMI Complaints Management Handling Guide.

All complaints received are referred immediately to the TMI Compliance & Risk Team who are responsible for:

- ensuring TMI's complaints procedures are followed;
- ensuring the TMI Boards are provided with management information on the number and type of complaints received; and (if applicable);
- ensuring the relevant regulator is provided with the necessary complaints reports and notifications;
- conducting root cause analysis to ensure defective systems and controls are improved.

Further Information

Questions or requests for further information relating to the Policy should be addressed to the TMI Compliance & Risk Team.

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