



WAY Fund Managers

Treating Customers Fairly - TCF

WAY Fund Managers will pay due regard to the interests of its customers and treat them fairly in all of its dealings with its customers at all times.

The senior management at WAY Fund Managers is committed to ensuring that it meets the requirements of the Financial Conduct Authority's Principle 6, which states that:

"A firm must pay due regard to the interests of its customers and treat them fairly."

Principle 6 has been and will continue to be applied in all areas of WAY Fund Managers' day to day business and activities in a manner that is proportionate with respect to the nature, scale and complexity of our business.

WAY Fund Managers culture and its systems and controls are designed with its customers' interests in mind. WAY Fund Managers acknowledges that the regime of Treating Customers Fairly (TCF) is wider than its regulatory obligations contained in the FCA Handbook. We are therefore committed to considering every possible situation to ensure that it operates in accordance with the spirit of the TCF initiative and assessing whether compliance with specific rules is always sufficient to deliver the fair treatment of its customers.

In adopting the TCF principle, WAY Fund Managers is aiming to:

- Protect the interests of its customers at each stage of the product cycle, from promotion right through to after sales service;
- Meet, wherever reasonably possible, the unique needs of its customers by offering a transparent, efficient and professional service as well as constantly reviewing its services to identify areas for improvement; and
- Maintain appropriate records to enable WAY Fund Managers to demonstrate that it has met its TCF obligations.

Objectives for TCF

WAY Fund Managers has considered the implications of the FCA's six objectives for TCF and will ensure that, where appropriate, these outcomes are achieved and are integral to all of its policies and procedures.

When considering TCF there are a number of guidelines for firms to focus upon and WAY Fund Managers' employees must take these into account wherever appropriate:

Product Design – it is essential that when considering a new product, WAY Fund Managers reviews the product design and whether it is fit for purpose given the proposed target audience. TCF must be taken into account when considering any proposal for new business.

Remuneration – although WAY Fund Managers' employees are not commission or bonus driven; WAY Fund Managers does have a discretionary bonus scheme. WAY Fund Managers has an obligation to ensure that employees are considering TCF at all times and that any potential bonus payments that may be paid to them do not influence their judgment when considering outcomes for its customers.

Complaint Handling – WAY Fund Managers has a detailed Complaints Policy and TCF should be considered at every stage of complaint resolution.

Outsourced Activities – the FCA makes reference to firms which manage relationships when dealing with outsourced providers and has provided guidance. WAY Fund Managers will always acknowledge that the responsibility for the activity in question has not been outsourced and/or delegated and that due diligence with respect to the outsourcing of activities at both inception and continual oversight includes consideration of the third party's TCF procedures.

Strategic Change – TCF implications should always be considered at an early stage of any change project.

Management Information – WAY Fund Managers incorporates management information into its day to day business to re-enforce the TCF policy of the firm. This is also achieved by the regular review of key performance indicators and root cause analysis within relevant departments.

Training – New employees will be introduced to WAY Fund Managers' TCF policy at induction and all existing employees will complete computer based training as a refresher.



WAY Fund Managers Limited (Registered in England and Wales No 4011838).

Authorised and regulated by the Financial Conduct Authority.

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