

360 Capital Ltd

(the "Provider")

TREAT CUSTOMERS FAIRLY

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Revision History

Revision	Date of Adoption
Version 1	2020-07-23



TREATING CUSTOMERS FAIRLY

The Financial Services Commission (FSC) introduced Treating Customers Fairly (TCF) to ensure that the fair treatment of customers is embedded within the culture of regulated financial firms. TCF is an outcomes based regulatory approach that seeks to ensure that specific, clearly articulated fairness outcomes for financial services consumers are delivered by financial institutions.

These outcomes must be demonstrably delivered throughout the product life cycle, from product design and promotion, through advice and servicing, to complaints and claims handling – and throughout the product value chain.

360 Capital 's approach to TCF was to “expand our DNA”, by creating an internal campaign to raise awareness on this initiative by training our staff, and then rolling out externally once we were confident that TCF had become central to our culture.

One of the core values to which 360 Capital strives is to treat our customers fairly. To achieve this our principal driving force of our business model, rules, regulations and privacy policies are geared to ensuring our customers are treated fairly, not merely as a policy, but rather as a vital component in relation to advancing business.

Our quality service should speak for itself. We place emphasis on retaining and maintaining excellent relationship with our customers and hence drive our business model to provide our clients with the best trading services and advice possible. 360 Capital understands our clients' needs and strive to ensure transparent and fair dealings. As a company we believe in building a lasting relationship with our clients, based on trust and integrity.

THE SIX OUTCOMES OF TCF ARE:

1. Culture and Governance;

Clients are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture. Our board is involved with TCF decisions and communicates to staff about it. TCF is a standing agenda point at all our executive committee meetings.

2. Products;

The products and services marketed and sold are designed to meet the needs of identified customer groups and are targeted accordingly.

We keep ongoing and sufficient details about our clients and our clients' existing positions – at a minimum, an annual catch-up meeting is scheduled with each of our clients.

3. Clear Communication;

To give clear information to clients and keep them informed before, during and after the time of contracting.
The mechanics and risk profile of the products disclosed to the client in plain language.

In terms of section 7 (1) (a) of the General Code of Conduct we must provide a reasonable and appropriate general explanation of the nature and material terms of the relevant contract or transaction to a client, and generally make full and frank disclosure of any information that would reasonably be expected to enable the client to make an informed decision.

Our record of advice complies with the General Code of Conduct and contains all required disclosures.

A high level of insight into the quality of advice provided about our products/portfolios/services is sustained in the form of dedicated ongoing research and analysis collated by a senior analyst and the investment team.

4. Suitable Advice;

Where clients receive advice, the advice is suitable and takes account of their circumstances.

In terms of Section 7 of the FSC Code of Conduct we must do a suitability analysis prior to providing a client with advice – a full and comprehensive analysis is undertaken.

5. Performance and Standards;

The performance of products and service levels are according to our clients' expectations.

We check product performance and perform our own analysis before we offer these to our clients.

We have adequate service liaison structures in place to ensure the end client receives reasonable service.

Errors are dealt with at the highest leadership capacity possible – the CIO and CEO would become directly involved when and where necessary.

6. Complaints;

Complaints are a massive part of TCF and we have committed to making sure that we have adequate processes in place to ensure fair treatment of our customers even when things went wrong. To that end we created a Complaints Resolutions Procedure.