

## Treating customers fairly (TCF)

**1** Treating customers fairly is core to Castle Trust Bank's business and strategy.

**2** Castle Trust Bank is embedding the treating customers fairly outcomes and principles within its culture, business processes and procedures.

**3** Castle Trust Bank's board of directors and senior management lead by example and emphasise the importance of the TCF principles and the achievement of good outcomes for customers. Treating customers fairly is included in key change processes, such as product Governance, marketing and advertising.

**4** Treating customers fairly represents a practical articulation of one of the core overarching FCA principles of business: "A Firm must pay due regard to the interests of its customers and treat them fairly".

**5** The principles of treating customers fairly are relevant to both Castle Trust Capital plc and Castle Trust Bank (both trading as Castle Trust Bank and together "Castle Trust Bank") and both the letter and spirit of our TCF Policy is applied and respected throughout Castle Trust Bank.

**6** Castle Trust Bank recognises the importance of putting customers' interests first and promoting the fair treatment of customers throughout the life cycle of a product from the point at which the product is designed, through to post sales support. Castle Trust Bank management make sure that all decisions relating to its business are made having full regard to the interests of customers.

**7** In order to achieve its stated treating customers fairly objectives (and to do so in a comprehensive manner), Castle Trust Bank ensures that TCF appropriately influences all areas of its business, including: product design; strategy; training; staff behaviours; and remuneration. Castle Trust Bank monitors its treating customers fairly performance and is committed to maintaining high standards.

**8** Castle Trust Bank applies treating customers fairly principles to all of the products that it designs, markets and distributes. The FCA has issued guidance on the responsibilities of providers and distributors for the fair treatment of customers and Castle Trust Bank uses this guidance to steer its approach towards implementation of treating customers fairly throughout the product life cycle.

**9** Castle Trust Bank uses treating customers fairly management information as a key tool to capture data regarding treating customers fairly and the key intended outcomes. This management information is designed to enable Castle Trust Bank to ensure that treating customers fairly is, in reality, underpinning its strategic decisions and operational practice and demonstrates the fair treatment of customers.