

Treating Customers Fairly policy

Treating Customers Fairly policy for Premier Miton Group plc and its subsidiaries from time to time (together "Premier Miton").

Premier Miton is a UK asset management group with a focus on delivering good investment outcomes for investors through relevant products and active management across its range of multi-asset, equity, fixed income and absolute return funds. Premier Miton aims to treat customers fairly, deliver good investment outcomes for investors and looks to ensure that it engages with its customers in a manner that is open and transparent, and with communications that are clear, fair and not misleading.

Premier Miton's business depends upon long-term relationships with customers, financial advisers, distributors and other third parties, so this approach is soundly commercial. However, it also has to comply with the principles of its regulator, the Financial Conduct Authority (FCA). The core principle is that a firm must pay due regard to the interests of its customers and treat them fairly.

Other key principles are:

- A firm must conduct its business with integrity.
- A firm must pay due regard to the information needs of its clients, and communicate information to them in a way which is clear, fair and not misleading.
- A firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client.
- A firm must arrange adequate protection for clients' assets when it is responsible for them.

The FCA introduced the TCF initiative to deliver improved outcomes for retail customers of the firms they regulate, such as Premier Miton. The outcomes that are expected are noted below:

Outcome 1:

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

Outcome 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.

Outcome 3:

Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.

Outcome 4:

Where consumers receive advice, the advice is suitable and takes account of their circumstances. (Please note that Premier Miton does not provide investment or tax advice).

Outcome 5:

Consumers are provided with products that perform as firms have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect.

Outcome 6:

Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.



Premier Miton aims to deliver the FCA's TCF outcomes in the following ways:

- The responsibility for ensuring that TCF is implemented in the systems and culture of Premier Miton lies with the Board of Directors of Premier Miton.
- Senior managers and staff are responsible for ensuring that TCF outcomes are effectively managed within their area. This includes working to ensure that everyone in Premier Miton understands how to deliver the TCF outcomes.
- Premier Miton aims to demonstrate the achievement of TCF objectives in regular reporting under the FCA's Senior Management Systems & Controls arrangements. This reporting is also subject to monitoring by Premier Miton's compliance & legal team.
- Premier Miton aims to describe clearly the different investments it offers, including their aims, objectives and other features, to ensure customers understand the investment approach and the risks and costs involved.
- The TCF requirement applies to all Premier Miton staff and this is made clear by inclusion in the induction programme for all new employees, and a statement in the Premier Miton Staff Handbook, supported by regular communication with all staff.
- Where Premier Miton delegates an activity which impacts its customers, financial advisers, distributors or other third parties, to a regulated company or otherwise, Premier Miton looks to ensure that the principles of TCF are maintained by that delegate. It also arranges to receive regular feedback on the TCF activities of its third party administrators and to ensure that they have access to appropriate technical information and literature concerning Premier Miton products.
- Premier Miton aims to act consistently with applicable guidance around TCF from the FCA and, where appropriate, other industry bodies.

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