

TAM'S APPROACH TO THE FOUR CONSUMER DUTY OUTCOMES

The Principle behind Consumer Duty is clear, “firms must act to deliver good outcomes for retail customers”.

PRODUCTS AND SERVICES

TAM is required to review and improve if required the product design for the consumer. The regulator asks us to ensure we are targeting and distributing those products to the right market. The Duty requires a deeper understanding of client needs and objectives than before, and a more open dialogue and information exchange between advisers and providers (manufacturers) to ensure products offered are fit for purpose. In this, advisers have a substantial role given their interaction with clients, and TAM will work with advisers to elaborate data.

TAM are required to:

- Study our target markets to be able to match our perceived target market needs to product benefits.
- Disseminate necessary information about products, in order that advisers may accurately distribute to appropriate clients.
- Create distribution strategies that are consistent with their own target markets for the product and regularly review those strategies to ensure ongoing client needs are considered and met.

- Supply product review information to advisers when requested including product performance data and client feedback.

TAM has undertaken reviews of product performances, as is applicable to the risk and style of the products offered. These are included in “fair value” reviews.

Our reviews have used available data and include the below:

- Sales information plus external third-party assessments
- Analysis of product performance and peer and index comparison
- Customer feedback, and/or complaints and interaction
- Surveys and other forms of client driven commentary and/or research

PRICE AND VALUE

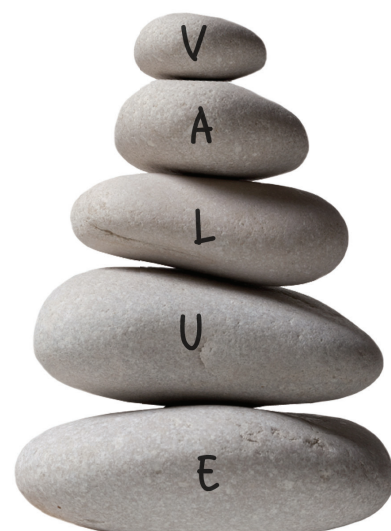
The regulator has tasked the market to confirm firms ensure that clients are receiving “fair value” from products and services.

TAM need to show that the costs clients pay are “reasonable” in relation to the service and outcome they receive. It indicates that we as a product provider (manufacturer) use an assessment process to quantify benefits and costs. The core goal is to remove unnecessary or undeclared costs, now or in the future, which might cause harm to clients.

This is a specific evidence-based outcome because it requires TAM to weigh up every aspect of a product’s suitability. For example, it requires our firm to show awareness of costs that might be triggered in the future, and of costs likely to be incurred at different stages of the product life cycle in the prevailing and expected operating environment.

TAM are required to:

- Assess the total cost of our product to a client, including platform and manufacturer charges.
- Demonstrate that “fair value” to clients is both achieved and being reviewed on an ongoing basis by balancing costs against benefits.
- Longer term value should be monitored to ensure it does not materially change over the lifetime of the product or fall out of “fair value assessment”.
- Amend or withdraw a product if anything materially affects the value the product offers to clients.
- Review and determine products offer value to all client groups targeted, being especially careful with vulnerable customers. Provide ongoing assessment of historic products to maintain “reasonable” price and value in relation to newer products of a similar type in the current market.
- Note any value-add benefits like better support systems, transparency, and convenience etc.



TAM has a Consumer Duty champion who has worked both with the Compliance Department and the Board of Directors to assess fair value across products, and TAM has proactively made changes where we considered fair value could be enhanced. We will review annually, or as required, prices and assessments. These assessments will reflect the product’s complexity and the work required to offer the product and review for indications of possible client harm.

TAM will need to show evidence of these value assessments to the FCA if required utilising:

- Management information documents
- Records as outlined in the Senior Management Arrangements, Systems and Controls sourcebook (SYSC).
- Industry pricing, profitability data, including costings.
- Independent and client facing surveys and ongoing interaction with IFA’s.
- Information on operational issues that might affect value assessment such as website outages, Pershing outages etc.
- Product retention and turnover data reflective of client switching with knowledge as to why.
- Interaction with clients as received on product and analysis and responses to any complaints or client contact in general.

CONSUMER UNDERSTANDING

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TAM must offer clear and appropriate communications.

- Any communications follow guidelines and use Plain English wherever possible using visuals where appropriate. It is key to ensuring consistent terminology across all outputs.
- Communications are reviewed for clarity to the target market and written with due deference to possible personal vulnerabilities.

- Oversight of communications that directly impact clients' decision making is essential. We are expected to review and sanitise all communications including any forms of advertising and/or external messaging.
- All our communications are reviewed for balance, particularly where they relate to risk and price as well as the possible gains. Clarity on fees is paramount and imbedded in TAM output.
- Output is discussed with IFAs for appropriateness and usefulness

TAM will continue to review and seek to improve the understanding of its outbound communications. Consideration to testing the output before release and reviewing the feedback after sending is being enhanced to embed improvements if required.



CONSUMER SUPPORT

TAM seeks to support clients “effectively”, in order that they may benefit from products and services on offer. TAM seeks to provide modes of support with ease of access, proffering no barriers to contact and having suitably trained staff available.

TAM has reviewed and considered its support channels and available personnel. TAM have installed more structure to monitor feedback and contact to ensure best effect for clients. TAM has more staff available to answer questions and queries than its sales team to support good outcomes.

TAM have reviewed and developed its support structure:

- TAM communicates extensively on a quarterly basis with clients by extending its MIFID statement commentary.
- Reviews and considers client responses and vulnerability issues whether caused by life issues, or by economic stresses or similar.
- Ensures that support can be tailored for vulnerable customers and there are no barriers to ascertaining vulnerability in clients
- TAM will seek to identify if poor client experiences are witnessed that they can be modified and improved.
- TAM has a free switching and support capability and has no barriers to exit on any of its products. Whilst there may be some administrative charges such as dealing fees and banking charges incurred, TAM do not impose an exit fee or penalty. Access to staff should a query or complaint be needed is ongoing and with experienced staff.
- TAM continues to monitor and engage with any third parties in the product process to seek best outcomes but does rely on third party channels – such as regulated IFA's who this firm engages with to ensure best understanding.

TAM monitors both client feedback and product usage via its telephone lines and other client-adviser contact points where that is possible. Information for review and amendment to the customer journey is monitored.

- Client call listening review and interaction.
- Interaction with Advisers on a regular basis
- Analyses of complaint flows
- IFA and client surveys
- Independent third party surveys (e.g. Defaqto)



GET IN TOUCH WITH US

+44(0)207 549 7650 | info@tamassetmanagement.com
City Tower | 40 Basinghall Street | London | EC2V 5DE
www.tamassetmanagement.com

tam

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MANAGEMENT