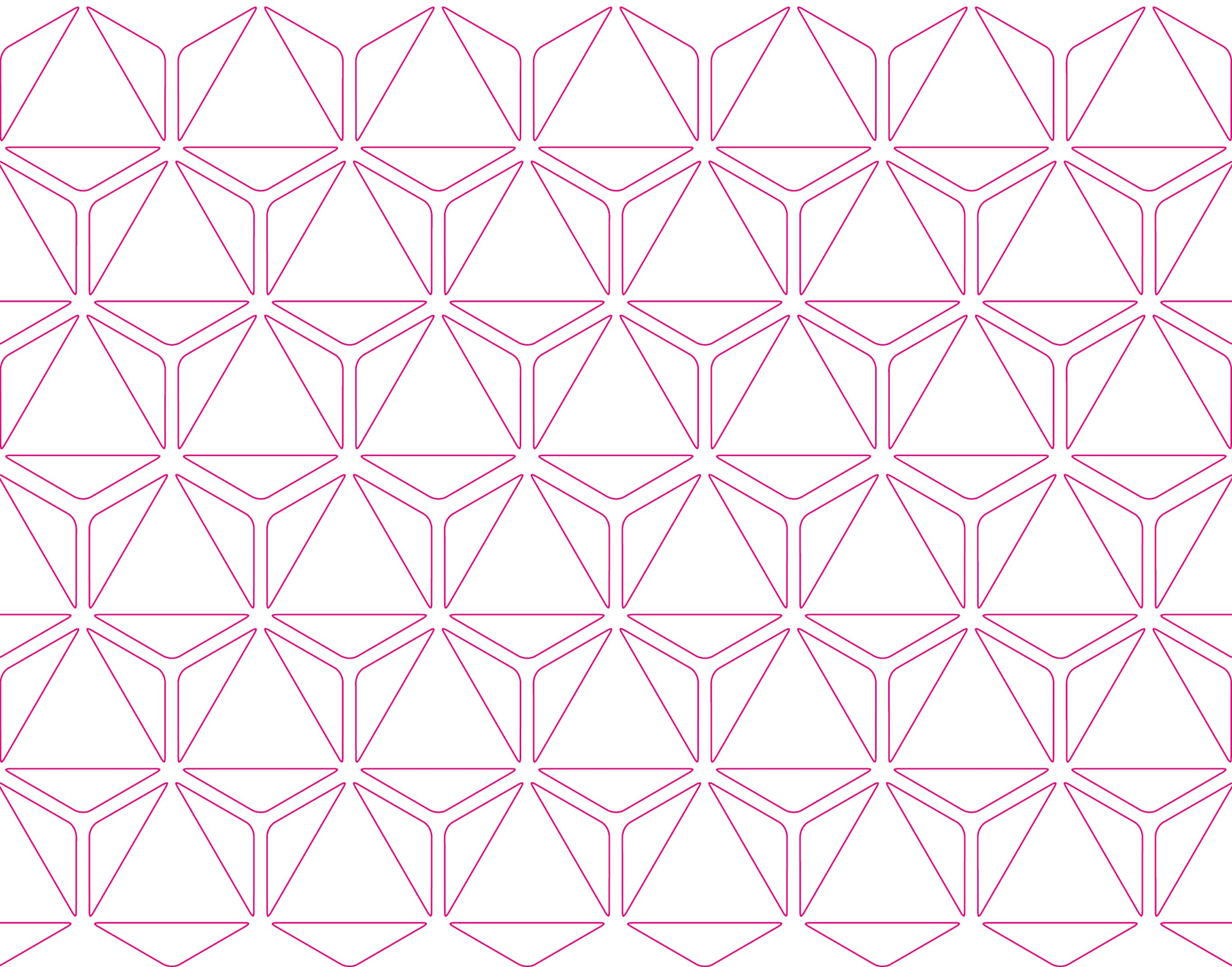


Our commitment to Treating Customers Fairly



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Praemium's Approach to Treating Customers Fairly

Praemium came to the UK in 2006 because we felt the market at that time was missing a low cost and transparent platform for portfolio management. With Praemium the investor always has the ability to view the underlying assets in their portfolio, and because trades are aggregated and costs spread across all related accounts, trading fees have the potential to be greatly reduced.

In the UK, Praemium's services are delivered by our subsidiaries Praemium Administration Limited, which is authorised and regulated by the Financial Conduct Authority (FCA) under reference 463566 and Smart Investment Management Limited, which is authorised and regulated by the Financial Conduct Authority (FCA) under reference 627829.

We have designed our system with open architecture so that registered users of the system are able to choose the best products available for their investment needs.

Our commitment to our customers does not end there.

Investors and their advisers are always at the forefront of everything we do. We make sure:

- ✓ Our documentation and systems information is comprehensive and easy to understand.
- ✓ Fees are clearly visible and understood by all parties.
- ✓ Advisers have access to a wide range of tax wrappers and assets.
- ✓ Portfolio information and values are always visible and up to date.
- ✓ Advisers always have available a dedicated Client Services team to answer any questions.

Here are the principles we live by:

1. **Communication**—We review all our documentation to ensure that all terms and conditions, and all charges, are clearly stated and understandable. Our key features documents clearly describe for investors the benefits and limitations of the services we will provide. We regularly review all our documents to improve their clarity and ease of use.
2. **Feedback**—We also believe that communication is a two-way street. We solicit and are directed by feedback from the advisers and investment managers who use our system as well as any feedback received from investors.
3. **Support**—All our customers have our ear! Our dedicated client services team is on hand to answer questions and resolve issues. Firms using our system will also be assigned a relationship manager to make sure they are getting the most out of the Praemium service and experience.
4. **Appropriateness**—Products on the Praemium platform are designed to meet the needs of financial advisers, stockbrokers, private banks and investment managers. Our products and services help firms using our system to serve the needs of the end investor and are targeted accordingly. As the needs and risk tolerance of an investor may change over time, Praemium's technology makes it easy for investors to change strategies to reflect their new investment objectives.
5. **Best value**—The Praemium technology is designed to be cost effective by aggregating trades and spreading the cost of trading across all related client portfolios. This is a unique feature and can be very cost effective in the long run for investors.
6. **Transparency**—The Praemium platform offers true visibility—of fees, portfolio valuations, tax reporting tools and all underlying assets. We are able to do historical portfolio reconstructions so investors and their advisers can know the value of their portfolios as of any date they choose.
7. **Customer-focused development**—All our product development is based on the wishes and needs of our customers. Products are tested by a select few customers before being released to the public, and we are constantly reviewing, updating and looking for ways to do things better.
8. **Complaints resolution**— We take complaints very seriously and act quickly to make sure they are resolved. We have in place a Query Management System (QMS) that helps us track, manage and quickly

deal with any customer queries. All complaints are recorded and followed up on in accordance with FCA guidelines. Our complaints policy can be found under Our Policies at www.praemium.co.uk.

9. **Management information**—We believe it is our responsibility to constantly evaluate the appropriateness and efficacy of our technology and services. Our management team maintains information on QMS, system performance, transactions data, sales, redemptions, complaints, feedback, errors, system usage, compliance and performance.

10. **Business ethics**—Our team will never enter into an agreement where there is a potential conflict of interest that is not managed appropriately (see Conflicts of Interest section below), where a customer could be disadvantaged, or that are not in the best interests of the end investor.

Policies and Procedures

▪ **Conflicts of interest** – Praemium has in operation a number of policies and procedures designed to manage any conflicts of interest which may arise in our fair treatment of customers. The following list is an indication and by no means exhaustive.

o Conflicts of Interest Policy – Any potential conflicts between the firm and its customers and between customers is identified, recorded on our conflicts register and managed accordingly.

o Gifts and Benefits Policy – A full Company policy is in operation and is applicable to all employees. Any corporate hospitality and gifts are to be declared to the Company’s compliance department. No instances of accepting an inducement whereby it gives rise to a conflict with our customers is permitted.

o Financial Promotions – When we issue any form of financial promotion material we undertake stringent checks to ensure that it is fair, clear and not misleading and that it is issued to customers only for whom it is potentially suitable. All associated risks are always clearly identified.

▪ **Data Protection Policy** – We treat our customers’ privacy extremely seriously and have in place a comprehensive policy which complies with all aspects of the Data Protection Act 2018.

▪ **Best Execution policies** – We will always strive to achieve the best outcome for our customers taking into account the various “best execution factors”.

We also fully endorse and have adopted the FCA’s standards for Treating Customers Fairly:

1. Customers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.
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.
3. Consumers are provided with clear information and are kept appropriately informed before, during and after the point of sale.
4. Where consumers receive advice, the advice is suitable and takes account of their circumstances.
5. Consumers are provided with products that perform as the firm have led them to expect, and the associated service is both of an acceptable standard and as they have been led to expect.
6. Consumers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint.

We regularly conduct customer surveys in order to continuously improve our service, and we always welcome feedback from all our customers. If you would like to send feedback to Praemium on TCF or any aspect of our business please call us on (0)20 3873 5566 or email clientservicesuk@praemium.co.uk