

## TREATING CUSTOMERS FAIRLY

KVB Prime (UK) Limited (hereafter known as "KVB Prime") is firmly committed to providing a premier dealing environment focused on client experience. We recognise that the Treating Clients Fairly (hereinafter "TCF") framework is fundamentally important to drive up standards in the financial services sector. As such, TCF is central to the delivery of our regulatory principles and is used to ensure that an efficient and effective market place to help consumers secure a fair deal. KVB Prime has adopted this ideal as a course of best practice, and in an effort to deliver the highest levels of business continuity.

The KVB Prime's TCF strategy is focused around the six mandated client outcomes which all registered firms must comply with. At this juncture it should be noted that, at present, KVB Prime only offers an execution only service thus no advice is provided.

We will review our TCF policy on a continual rolling basis so that we always observe these directives.

### 1. Our TCF objectives

In order to meet client expectations in relation to our services we are fully committed to treating clients fairly at all times and as such we endeavour to demonstrate the quality of our service as below:

- Act firmly with the customers best interests as a primary consideration.
- We respond in a fair, objective and timely manner to our clients' queries. All client complaints are dealt with and escalated as appropriate and as required by us in order to meet our obligations to the client and our regulator (the UK Financial Conduct Authority).
- Ensure our staff understand, adopt and implement the TCF principles throughout the firm.
- Produce and monitor Management Information as a continual assessment of the firm's activities against TCF principles.
- Ensure remuneration is fair to clients.
- We will always ascertain the appropriateness of our services towards new clients prior to offering them an account.
- Ensure all client information is kept in the strictest confidence.
- Share experiences among the staff and impart lessons learned in dealing with complaints to all company employees.
- Avoid conflicts of interest, if such conflicts should arise, resolve them promptly and in agreement cordially with clients.
- Obtain and keep detailed records throughout the process to ensure we are taking appropriate action for clients.
- Explain clearly how KVB Prime generates profits and fully explain any potential costs, which the client could incur.
- Maintain effective customer support after the trade is booked to ensure staffs are accessible and there are no barriers in dealing with financial arrangements.

- We will also ensure that our offering is in line with their knowledge and experience.
- Communicate effectively with clients to ensure we have a full understanding of their priorities and concerns.
- In addition we will always ensure that product and risk information remains clear and prominent at all times.
- We continually aim to keep you fully informed in a clear and fair manner that is unambiguous and not misleading. We endeavour to ensure that you understand and are reminded of the risks associated with our trading products.
- We provide valuable educational tools and a constantly evolving trading platform to match your trading requirements. We strive to provide an uninterrupted trading service and highly competitive spreads. In addition to this we offer effective and easily understood risk management tools.

## **2. Summary**

We believe that the dynamics of TCF are best initiated at point of client contact and so our Client Service Desk has been empowered as the focus for TCF interaction and implementation with the rest of the company geared to TCF follow up. Processes have been employed to capture the widest possible range of Management information on TCF relevant issues which are then collated by the Compliance Officer. This information is then reviewed to identify client trends and solutions which will lead to an increase in the overall client experience. We are committed to providing the best trading experience possible to our clients.

## **3. Related policies:**

- Order & Execution Policy
- Conflicts of Interest Policy
- MiFID Complaints Policy
- Privacy Policy
- Client Money Protection