



CMX
trade cmx



TREATING CUSTOMERS
FAIRLY

Treating Customers Fairly Initiative

The Financial Services Authority ('FSA') has been promoting Treating Customers Fairly ("TCF") as a philosophy, broadly via the principles for business and the FSA's promotion of an outcomes based regime. Principle 6 states that, 'a firm must pay due regard to the interests of its customers and treat them fairly. The FSA want to use TCF to help change the way the financial services sector does business. By doing this, the FSA believes that the public image of the financial services sector will be improved, resulting in more trust from Clients.

TCF at TradeCMX Limited

The Directors and senior management at TradeCMX Limited ("TradeCMX" or the "Company") are committed to ensuring that they meet the requirements of Principle 6. Principle 6 has been applied in all areas of TradeCMX' day to day business activities in a manner proportionate to the nature, scale and complexity of the business. TradeCMX' culture and our systems and controls are designed to ensure that our relationships with Clients are built on using knowledge, connections, expertise and imagination in the relentless pursuit of its clients' interests.

TradeCMX is committed to considering every possible situation which works within the spirit of the TCF initiative and assessing whether compliance with specific rules is always sufficient to deliver the fair treatment of all its clients.

In adopting the TCF principle TradeCMX is aiming to:

protect the interests of Clients at each stage of the product cycle, from promotion right through to after sales service in a way which is proportionate to the nature, scale and complexity of our business; meet, where possible, the unique needs of Clients by offering a transparent, efficient and professional service, constantly reviewing our service to identify areas for improvement; ensure TradeCMX maintains appropriate records to enable the firm to demonstrate it has met its TCF obligations.

Objectives for TCF

TradeCMX has considered the implications of the FSA's six objectives for TCF, which are:

Outcome 1 - consumers can be confident that they are dealing with firms where TCF is central to the corporate culture;

Outcome 2 - products and services are designed to meet the needs of identified consumer groups and targeted accordingly;

Outcome 3 - consumers are provided with clear information and kept appropriately informed before, during and after the point of sale;

Outcome 4 - where consumers receive advice, it is suitable and takes account of their circumstances;

Outcome 5 - consumers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and as they have been led to expect; and

Outcome 6 - there are no unreasonable post-sale barriers imposed by firms when consumers want to change product, switch provider, submit a claim or make a complaint.

TCF Areas of Focus

TradeCMX has considered five areas of TCF focus which they believe to have the highest impact and to be relevant to the nature, scale and complexity of the business:

Senior Management Responsibilities

Marketing

Complaints

Relationship with Business Partners

Management Information

Senior Management Responsibilities

The responsibility of delivering TCF lies with the Directors of TradeCMX. The firm has considered the TCF requirements in light of the nature, scale and complexity of TradeCMX' regulated activities. The Compliance Officer, who is responsible for the TCF requirements, ensures that the Principles of TCF are being considered and delivered appropriately at every level of the firm and a review of the firm's regulated activities against its TCF obligations is being addressed. Therefore, any shortfalls would be considered and appropriate measures put in place to close any TCF gap.

Marketing

The role that TradeCMX undertakes is to market the services of its Parent when dealing with retail customers directly. The significant proportion of the TradeCMX Marketing is to retail clients.

TradeCMX has been granted permission to deal with Retail Customers by the FSA and will likely categorize the majority of its clients as retail and therefore offer the required protections afforded to Retail Customers. TradeCMX ensures that the promotional material released has followed a robust sign off procedure and remains compliant.

Complaints

TradeCMX has a stringent complaint handling policy and in case of receiving any, our policy ensures that responses are appropriate. In addition, TCF will be included in our staff training (both initial and refresher).

Relationship with Business Partners

In general, TradeCMX business partners will deal with retail customers, however, when selecting business partners TradeCMX undertake a robust due diligence process. TradeCMX will provide business partners with help, when required, to bring their practices in line with its treating customers fairly agenda. TradeCMX is committed to delivering clear information to customers before, during and after sales. All fees, charges and service level agreements

are clearly identified before commencement via our Engagement Letters and Terms of Business. Clear risk warnings are provided where appropriate in the relevant documentation. We minimize conflicts of interest where possible and if the conflict cannot be avoided then it is identified and handled in accordance with our policy.

Management Information

The management information currently delivered to senior managers regarding Retail Customers is subject to a review. TradeCMX monitors the relevant indicators, such as the level of retail investment and the promotional information, needed to effectively assess TCF across the business. This is proportionate to the nature, scale and complexity of the firms business.