

## **Treating Customers Fairly Policy**

### **1. Introduction**

KVB PRIME (UK) LIMITED (hereinafter known as “KVB Prime”) is firmly committed to providing you 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. 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 you 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.

### **2. Our Commitment to you**

In order to deliver your expectations in relation to our services we are fully committed to treating all 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

### **3. Timelines**

In order to provide a consistent and timely response to all complaints KVB Prime has adopted the following complaint handling time thresholds:

- 5 business days – within which we will acknowledge in writing a complaint has been received. This will either be that we require more time to investigate or our response.
- 4 weeks – within which we will have sent you a response or a holding acknowledgement that we require more time and the actions taken so far.
- 8 weeks – within which we will have either sent you our response or that we require more time. Either way you may be legible to refer your complaint to the Financial Ombudsman Service (FOS) if you are not satisfied.

Please see our “Complaints Procedure” found within our legal section of the website for further information.

#### **4. Summary**

We believe that TCF is best initiated at point of client contact and so our Client Service Desk has been empowered as the focus for TCF interaction and implementation. The rest of the company is geared up to support any TCF initiatives that may follow.

We are committed to provide you the best trading experience possible and we will continually listen to any comments/suggestions that you may have.