

Grovelawn Limited Policy Statement on Treating Customers Fairly (TCF)

The aim of this statement is to detail the Firm's policy with regard to FSA Principle 6: "pay due regard to the interests of its customers and treat them fairly" and the processes of putting customers' interests at the heart of the business.

General risk assessment: The firm is committed to the rules and general principles of the FSA and has close links with its clients. Complaint levels are low with only 1 made in the last year. We have excellent recording and administrative systems and regularly review staff competence. We monitor levels of client care on a regular basis, particularly where there is any evidence of client misunderstanding regarding the firm's services, systems and advice process. Good communication with our customers provides a better understanding of their requirements and ultimately builds trust between customer and firm. The firm's remuneration structure is regularly reviewed to ensure that it does not cause any conflicts of interest.

All of the above embodies TCF and why we assess our TCF risk as low. On an ongoing basis, we have the advantage of using Sesame as our mortgage and general insurance network. Sesame assesses our strengths and weaknesses in terms of TCF and monitors our TCF throughout the year

Financial promotions, correspondence and report letters: It is the policy of the firm to attempt to make all correspondence and promotions with clients as clear, concise, simple, fair and not misleading. We attempt to make suitability letters as easy to understand as possible.

Advice and sales process: We will at all times ensure that advice is appropriate and that due account has been taken of the client's specific profile, needs, knowledge and attitude to risk. When assessing our client's attitude to risk we will do our best to ensure that they understand what this means. We will always discuss the alternative methods of repayment, and selection criteria in detail with our clients. We will always obtain sufficient client information to understand their circumstances, needs and requirements. By completing fact finds in all cases, we will provide clients with suitable advice and an ongoing review of their mortgage requirements to ensure that they have access to competitive products. We will then give our clients the option to act upon these needs or reject them if they wish without pressure to proceed. We will always ensure that we disclose information in a way that is understandable to our clients whilst complying with FSA rules and requirements. This particularly applies to the potential risks clients take when investing.

We will always ensure fair treatment:

If any policy exclusions or charges apply, we will bring these to our client's attention without prompting and explain their effects either at a client meeting, or where requested in writing. Flow of information between the firm and its customers: It is important that customers understand the nature of the services being offered by the firm and how they pay for them. The firm is an Independent Whole of Market Mortgage Intermediary and operates on a selection of non fee and fee based options.

We will always be open with our clients and will, if relevant, communicate with them on any matters that might affect them.

GROVELAWN FINANCIAL SERVICES, GEMINI HOUSE, HARGREAVES ROAD, SWINDON, WILTS, SN25 5AZ
TEL. 0845 458 2633 FAX. 01793 706 533

GROVELAWN FINANCIAL IS A TRADING STYLE OF GROVELAWN LTD. GROVELAWN LTD IS AN APPOINTED REPRESENTATIVE OF SESAME LTD WHICH IS AUTHORISED AND REGULATED BY THE FINANCIAL SERVICES AUTHORITY.

GROVELAWN LIMITED IS REGISTERED IN ENGLAND & WALES NUMBER 5030300.
REGISTERED ADDRESS: 98 STATION ROAD, SIDCUP, KENT DA15 7BY. CONSUMER CREDIT LICENCE NUMBER 573287.

CONVEYANCING IS NOT REGULATED BY THE FSA OR ARRANGED VIA SESAME LTD.

Accurate and timely record keeping: it is important that we keep accurate and adequate records of customer needs and instructions at each stage of the sales process. It is also important that the administration of a client's transaction is carried out efficiently. Accurate records are kept to record all advice and information given and received.

If a customer requires information, we will be open and responsive to their request, replying in a timely manner. We will be mindful of the need to review customer information to ensure its accuracy and to comply with the Data Protection Act. This will enable us to respond fairly to our customers in the unfortunate event of a customer dispute. At all times we will ensure that client data remains confidential.

Disputes and complaint handling: We already have in place a written complaints procedure that every member of staff has read and understood. It is important that disputes are handled sympathetically and that the firm is open and honest about its mistakes. We recognise that a well-handled complaint can prevent a potentially difficult situation escalating and can ultimately retain customer loyalty.

We will be open in our complaint handling procedures and inform customers of areas outside of their complaint, if applicable, where we may have discovered errors of which they may not be aware. A complaint does not automatically lead to compensation, putting the matter right and offering an apology may often be more than enough. Customers readily accept that errors occur and in many cases are gratified that a firm will accept that they are fallible and keen to rectify the situation.

Staff training: We acknowledge that the dealings of all staff affect whether customers are treated fairly. Having members of staff who are adequately trained and mature enough to acknowledge whether a task is outside their expertise is important in this regard. Continuous professional development is important for all members of staff to maintain skills and competence. We also encourage our staff to obtain professional examinations.

Information from Lenders, Insurers & Providers: It is important that staff understand and consider documentation supplied by Lenders, Insurers & Providers, to ensure that they fully understand the features and risks associated with the product being recommended. Staff should also be in a position to make an informed judgement on the content and opinions expressed in any Lenders, Insurers & Providers.

Keeping up to date: The Apportionment & Oversight Function and Sesame will continue to monitor further FSA guidance, to ensure that TCF is consistently built into the overall culture of the business, at all times.

Your property may be repossessed if you do not keep up repayments on your mortgage.

For mortgages you can choose how we are paid: pay a fee, usually 1% of the loan amount subject to a minimum of £500 and a maximum of £3,000; or we can accept commission from the lender.

Signed on Behalf of the Firm's Senior Management:

Name of Apportionment & Oversight Function - James Hewson

Signature of Apportionment & Oversight Function

Date: 20th January 2010

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