



Our mission statement

We place customer interests at the heart of everything we do and commit to treat customers with honesty, fairness and respect at all times.

Treating Customers Fairly (TCF) and customer service is a significant part of our philosophy and we know that good customer service equates to good business.

Our core values

In adhering to the following core values, we believe we build and strengthen effective working relationships with both our customers and staff, ultimately to continually enhance the level of service we offer:

- **Customer-focused**
- **Expertise**
- **Integrity**
- **Commitment**
- **Passion**
- **Quality**

We recognise the importance of our staff in fulfilling our aims and have focused on, and invested in, maximising their potential by implementing and developing our training and competence policy.

What is Treating Customers Fairly?

Officially, a UK firm “must pay due regard to the interests of its customers and must treat them fairly.” For Harbour Underwriting, this is not a regulatory tick-the-box exercise – it is at the heart of who we are.

We embrace TCF and embed it into our company culture and will continue to ensure that TCF is integral to our products, our service, and our operations. We are aware that to treat our customers fairly, we need to:

- provide a professional service
- sell customers quality products that fit their needs
- ensure that no claims are unreasonably rejected

We achieve this by:

- including customer-focussed accountabilities in role profiles of relevant staff
- providing all relevant staff with TCF and customer conduct training

Quality products

We have a product development policy which requires us to review all new and certain updated products prior to launch to ensure, amongst other things, they are consistent with TCF and customer conduct principles.



We have a marketing and financial promotions policy which ensures our marketing and sales materials:

- are clear, fair and not misleading
- support our TCF policy and
- comply with corporate standards and relevant product and distribution policies

The marketing and financial promotions policy also covers:

- the approval and sign-off of financial promotions by our Group Compliance Department
- the timely review of existing promotions
- the management of the withdrawal of expired financial promotions

Commitment to claims

We meet this requirement by ensuring:

- we provide customers with clear information during the claims process
- we provide a clear explanation for the rejection or partial settlement of a claim
- we consider and apply relevant guidance from the Financial Conduct Authority and we work openly with the Financial Ombudsman Service in the event of unsatisfied customer feedback

TCF is embedded in our policies and processes and is central to our culture. We provide TCF and customer conduct training for all our staff on an annual basis using our regulatory e-learning programme.

We ensure that TCF is embedded throughout the business by:

- ensuring management functions, roles & responsibilities reflect customer focus
- requiring all relevant staff to have customer focus objectives as part of our annual performance review processes
- ensuring the production of detailed TCF and customer conduct management information is a business as usual practice
- regular TCF reviews by our Board to ensure that TCF principles are being met and to identify and drive through any remedial actions, best practice, and policy.

Looking to the future

We acknowledge that TCF is live and very real. Accordingly, we continue to monitor our TCF policy and best practice as well as our conduct with customers and we continue to review and act on the relevant management information to improve our customer experience.