

# Treating Customers Fairly Policy

Van Ameyde Group

1-4-2024

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# 2 Introduction

## 2.1 Version management and implementation

Version	Date	Changes	Author
0.1	18-12-2020	First draft	Risk & Compliance icw Business Development
1.1	11-02-2021	Updates following board comments	R&C
2.0	29-06-2022	Update	Risk & Compliance
3.0	21-07-2023	Update	Risk & Compliance
4.0	22-03-2024	Update	Risk & Compliance

## 2.2 Policy owner and contact information

The policy owner is the Director of Risk & Compliance.

It is the responsibility of all VA Group Companies' Managing Directors, Group Directors and Statutory Directors to fully implement the requirements of this Group policy.

The policy owner is responsible for providing all additional communications and/or training/guidance as required to assist with the implementation process.

The contact information of the department Risk & Compliance is:

Van Ameyde International B.V.  
 Department Risk & Compliance  
 Einsteinlaan 20  
 2289 CC Rijswijk

### **Mailing address**

P.O. Box 3038  
 2280 GA Rijswijk

Telephone: + 31 70 413 76 76

VA Group maintains a single point of contact for notification and coordination of incidents:

[Risk&Compliance@vanameyde.com](mailto:Risk&Compliance@vanameyde.com)

## 2.3 Scope

This group policy applies to all employees and temporary workers of the companies within the Van Ameyde Group (Van Ameyde), including any subsidiary, associate or joint venture in which Van Ameyde, directly or indirectly, has a controlling interest or is beneficiary.

## 2.4 Purpose

The purpose of this policy is to provide guidance to relevant individuals on treating our customers fairly looking at Van Ameyde Group's role within the insurance industry. This policy applies to all staff and other individuals whenever they interact or potentially interact with any of Van Ameyde Group's organization functions.

This policy:

- Defines what is meant by treating customers fairly;
- Describes the role of the policy the context of working within our organization;
- Sets out the roles and responsibilities for managing the TCF policy at each level in the organization.

## 2.5 Definitions

The following definitions apply in this policy:

- Van Ameyde: The Van Ameyde Group (VA Group).
- TCF: Treating Customers Fairly Policy.
- Financial Market Authority: relevant regulatory body overseeing the financial conduct of Van Ameyde.
- Client: a person or organisation making use of the services of Van Ameyde.
- Counterparty: a person or organisation being the opposing party in the services provided by Van Ameyde to its client.
- Employee: the person who, whether employed on a permanent basis or not, works for the company and its subsidiaries.
- Responsible person: an employee of Van Ameyde.
- Risk & Compliance: single point of contact as independent and impartial functions/staff, which is part of and serving the regions.
- Managing Director, manager or team manager: the supervisor of the department or team

## 2.6 Applicable law

The Dutch law is applicable for this policy. If applicable relevant local laws will be taken into account.

## 2.7 References

Please refer also to:

- Whistle Blower Policy;
- Business Principles;
- Fraud Prevention policy;
- Conflict of Interest and Anti-Bribery Policy.

Local procedures may be developed to support the implementation of this group policy. A local procedure may widen the coverage of this group policy but must not limit or redefine the requirements of this group policy.

# 3 Treating Customers Fairly

## 3.1 Introduction

Van Ameyde ensures clients and their customers are at the very heart of all that we do. They are our most valuable asset and our aim is to ensure we deliver a user-friendly, robust, reliable and cost-effective claim handling and IT service.

As a part of our overall approach, we are fully committed to treating our clients, their customers, and any counterparties fairly and as such, we endeavour to meet the clients' expectations of delivering a high-quality service. Our TCF is centred around the guidance provided by the local Financial Markets Authority to ensure we consistently deliver fair outcomes to our clients and take responsibility for the company and staff (at all levels) by providing an enhanced quality service based on our core values of transparency and trustworthiness.

## 3.2 Van Ameyde Group's TCF principals

As a Company, we take the requirements of the Financial Market Authority seriously, including our obligation and duty to treat clients fairly, which is central to the needs of our business. Our policy is based on the six key principals as outlined by the Financial Market Authority and we have set out below how we aim to ensure these principals are embedded in our approach to dealing with our clients, their customers and counterparties. In the event that there is a conflict between mandatory local law and this TCF, the former will take precedence.

Within Van Ameyde, the following six principles form the basis of its TCF policy:

**1. Customers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture.**

All of our staff are aware of our obligation and duty to treat customers fairly, not only because it is a regulatory requirement but also because customers are central to our business and treating customers fairly helps us to foster good relationships. This policy has been circulated to all staff and, furthermore, staff are encouraged to suggest ways in which we can enhance our service delivery by way of regular meetings.

**2. Products and services marketed and sold are designed to meet the needs of identified customer groups and are targeted accordingly.**

Van Ameyde is active in business-to-business and deals with corporate clients that engage with their customers. It is therefore our duty to develop services that best align with the customers of our clients.

**3. Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale.**

The nature of the products and services that we offer are such that we are required to interact closely with all of our clients. As part of this process, we are required to keep our clients and their customers informed of every development, which is strictly monitored by internal management information including Key Performance Indicators (KPIs) and Audit. KPI results are reviewed by senior management and published to clients and staff who act appropriately during the period.

**4. Where customers receive advice, the advice is suitable and takes account of their circumstances.**

We are committed to ensure that any recommendation that we give is suitable and fully takes into account an individual's circumstances. Our obligations and duties with regard to this outcome are to ensure that our staff are sufficiently trained and provided with the necessary tools to deliver services. Frequently updated industry training is provided in order that staff are aware of the most up to information and practices when assisting clients and their customers. We provide clear information to our clients and their customers and we are mindful, on a case-by-case basis, to determining the type and frequency of the information provided.

**5. Customers are provided with products that perform as firms have led them to expect, and the associated service is of an acceptable standard and as they have been led to expect.**

As set out above, we provide clear information to our clients and are mindful of our client / customer base by determining on case-by-case basis the type and frequency of the information provided. On an ongoing basis, we provide excellent service to our clients and their customers. This is demonstrated by growth and retention of our client base.

**6. Customers do not face unreasonable post-sale barriers imposed by firms to change product, switch provider, submit a claim or make a complaint**

We have in place a robust complaints procedure and handling policy, as described in section 3.3 of this policy document, which enables all complaints to be identified and investigated in a fair, transparent, and competent manner.

### **3.3 Complaints**

Van Ameyde has a detailed in-house complaints procedure, which is shared among our clients. Employees are trained to handle complaints in accordance with this procedure to ensure proper handling and compliance with rules and guidelines of the Financial Market Authority.

Complaints are reviewed by senior management on a periodic basis; escalations drawn from complaints are acted upon at the instance. Trends in complaints are determined to explore remedial actions, against individuals, products, processes or policy wordings.

### **3.4 Services to clients**

Van Ameyde achieves ambitious service level agreements (SLA's), which are set both internally and in concord with the client. The SLA's are constantly monitored and reported to our clients to safeguard expectations and service delivery. Superior results come from well-trained employees that understand customer service and upholding Van Ameyde Group's reputation by having the TCF principles at heart. Validation of clients come from quarterly and (bi-) annual claim reviews.

### **3.5 Conflicts of Interest**

In accordance with principles from the local regulatory bodies and Van Ameyde Group's Anti-Money Laundering Policy, Anti-Bribery and Corruption policy, Van Ameyde is committed in ensuring business is conducted in ways that are fair, within conform legal frameworks and professional integrity to align its interests with the best interest of its clients. Potential conflicts of interest between the company and its clients (and between clients) are continuously monitored. In addition, Van Ameyde has its Code of Conduct, exercising in its subsidiaries. This policy provides guidance and requirements for its employees, including the receipt of gifts, hospitality and oversight of relationships with clients and suppliers.

### **3.6 Incentive Schemes**

As mentioned above, Van Ameyde Group's policies make sure that Van Ameyde does not engage in incentive schemes that could breach the principles and outcomes of TCF.

### **3.7 Training and Competence**

Van Ameyde gives employees appropriate training to provide excellent customer service via the Van Ameyde Academy. The training programs of the Academy are much aligned with the TCF outcomes. All of our staff attend the Academy following appointment. Periodical training takes place via training modules that all employees are required to participate.

### **3.8 Employee Feedback**

Employees are encouraged to give feedback on any suggestions, concerns or improvements towards TCF (and other policies) to support in improving the business. Feedback can be provided to members of senior management and Risk & Compliance.

### **3.9 Mechanism for Review and evaluation**

The Treat Customers Fairly policy will be reviewed and evaluated following changes in company policy, legislation or best practices. The review and evaluation will take place on an annual basis during by Risk and Compliance to ensure validity and effectiveness.

# 4 Roles and Responsibilities

All relevant staff and other individuals have the responsibility to be aware of treating our clients and their customers fairly. It is likely that individuals working closely with an organization function will encounter potential conflicts, or issues, from time to time.

Such situations must be carefully managed to ensure that any TCF breach does not detrimentally impact on the standards of/or reputation of Van Ameyde.

## 4.1 Company level – responsibility of the senior management

The ultimate responsibility for the management of the TCF policy rests with the board and senior management.

Senior managers are responsible for communicating the TCF policy to all relevant individuals within their areas of responsibility on an annual basis.

Senior/Line managers are responsible for ensuring that TCF training of all staff takes place, including as part of induction.

## 4.2 Individual Responsibility

Every individual within Van Ameyde has the responsibility for ensuring that they are familiar with the TCF policy.

The most important feature of the policy is to ensure fair treatment of our clients and disclose the instances where this is not the case. If there is any doubt whether there is a potential non-compliance to the TCF policy, it is to be reported to Risk & Compliance.

It is an individual's responsibility to ensure that they take part in relevant training programmes.



# 5 Approval

The board of Van Ameyde Group approved this policy, effective from 01-04-2024. Any changes to this policy will require the approval of the board.

DocuSigned by:  
  
P. Middelkoop

08 April 2024  
Date

DocuSigned by:  
*Jan-Michiel Cillessen*  
J.M.J. Cillessen

08 April 2024  
Date

DocuSigned by:  
  
R.B. de Bruijn

08 april 2024  
Date