

The Provider Distributor Relationship

- 1. Some initial thoughts ...
- 2. The Three Party Process
- 3. Who Owns the Customer (and MI etc)?
- 4. "Responsibility Knocks"
- 5. The Friends Approach

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Some Initial Thoughts

A quote from a "Chief executive Officer":

"I can best describe my experience of nearly 40 years at sea [as]... uneventful. Of course there have been winter gales and storms and fog and the like, but in all my experience I have never been in an accident of any sort ... I have seen but one vessel in distress ... I never saw a wreck and have never been wrecked, nor was I ever in any predicament that threatened to end in disaster of any sort."

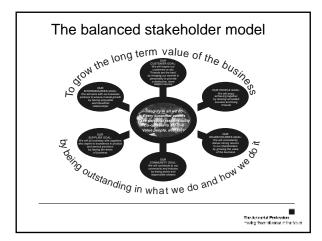
Is this our view on TCF? We all treat customers fairly?

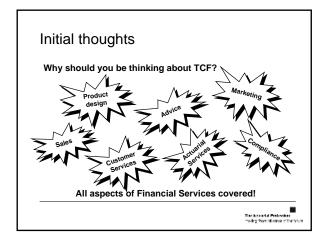
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Initial Thoughts

- 1. We all "feel" we ARE treating customers fairly
- 2. The challenge is proving it!
- 3. Friends do not see TCF as a project but as a cultural element to be embedded across the business
- 4. Represented by ...

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Initial Thoughts

TCF is relevant if you deal with:

- Business Strategy
- Product Design & Governance
- Marketing and Advertising
- Sales
- After Sales Service
- Complaints Handling
- Culture and Values

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THE THREE PARTY PROCESS

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The Three Party Process

- TCF papers/principles are far reaching
- But one area currently neglected:



Intermediated Sales introduce some interesting issues

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The Three Party Process

- Advice is central to the financial services value chain
- Oliver Page speech "Smaller firms ... may only be involved as a distributor"
- If more than one regulated firm is involved with a consumer how is the allocation of responsibility agreed?
- If the regulated firms understand the responsibilities does the consumer?

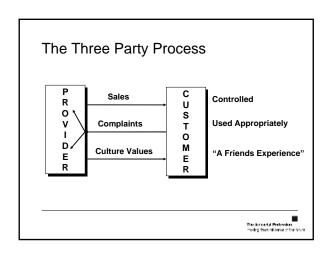
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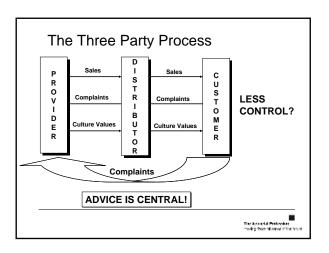
Key TCF Indicators	Provider View	Distributor View
- Business strategy	✓	✓
- Product design & governance	✓	?
- Marketing / Advertising	✓	?
- Sales	?	✓
- After sales service	✓	✓
- Complaints handling	?	?
- Culture and values	?	?
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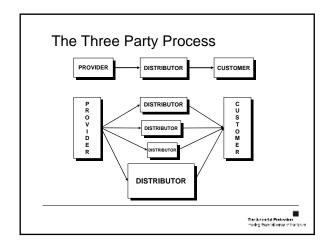
The Three Party Process

- Depolarisation new closer Provider-Distributor links (e.g. Multi-ties)
- Less clear distinction between IFA and AR?
- Less provider owned distribution
- Limited involvement with TCF to date?
- The role of the Distributor and more importantly the ADVICE is central to TCF and proof of fairness

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WHO OWNS THE CUSTOMER?

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Who owns the Customer?

- Provider will know target market, control marketing <u>BUT NOT</u> the advice or "fact find" process
- Distributor (IFA/MT) will have many facets of key TCF MI
 - Suitability of product (Term/IHT)
 - Sales process
 - Assessment of advice etc
- Understandably many Distributors see the client as <u>THEIRS</u> and do not encourage direct contact
- Friends accepts TCF applies to <u>ALL</u> customers but MI will be a challenge in this context

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Who owns the Customer

- Providers uneasy about responsibility for advice of Distributors and Distributors uneasy about long term suitability of some products!
- Does the Consumer/Customer see any division of responsibility?
- To what extent will Providers be able to control or even be aware of advice given by Distributors?

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RESPONSIBILITY KNOCKS

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Responsibility Knocks

- FSA view that Providers should "manage" their relationship with Distributors (vice versa?)
- Multi-Ties or IFA Investments may strengthen this view
- We may need clarity in literature on suitability of product and also the roles of all in the Three Party Process
- Seymour v Ockwell implications?

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Responsibility Knocks

- Will the FSA adopt a similar approach to that for outsourcing when looking at Multi-Ties?
- Will terms such as "best of breed" cause issues in the future?
- Will panel processes be under threat/challenge?
- More questions than answers

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THE FRIENDS APPROACH

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The Friends Approach

- Stating TCF policy in distribution negotiations (first formal requests have occurred)
- Recognise the role of TCF in a "three party process" over the full product life cycle
- Initiated discussions on the two-way provision of MI
 - Provider to Portal
 - Provider to "back office system"
 - Distributor to Provider?
 - Clarity on links between investments and best advice panels

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The Friends Approach

- Use of DATA WAREHOUSE to address MI on target markets, understanding who has what and why?
- DATA WAREHOUSE can focus on product lines or Distributor client banks with FP and others
- Reviewing remuneration policy internally and externally
- A different approach to "owning the customer"

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The Friends Approach

- Agreeing a TCF approach with distributor partners
 - Clear, concise literature
 - Support of all types for advice process
 - MI for back office systems
 - MI on complaints
 - Relationship management with a customer focus
- Measure distributor satisfaction and loyalty (ORC)

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Conclusion

- Considerable uncertainty in this area
- Principles could be open to application of hindsight
- The nature of the Provider/Distributor relationship WILL change
- Difficult to assess the impact of this change but we remain positive!
- Profitability and volume will no longer be the sole criteria for distribution relationships

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