

## Funeral Plan Pricing Policy

At L. W. Clutterbuck Ltd, customers are at the heart of our business, and we aim to treat all customers fairly. It is therefore hugely important to us that every funeral plan we sell is fairly priced.

As we offer tailored funeral plans to our customers (Golden Charter's 'Independent Way' plans), we are classed by the Financial Conduct Authority (FCA) as a funeral plan 'co-manufacturer'.

This document outlines our pricing policy as a funeral plan co-manufacturer, explaining the rules and principles we adopt when offering funeral plans to customers.

### Related documents

Our pricing policy works in conjunction with and we conform to all relevant funeral plan processes, policies and procedures contained within:

- Golden Charter's Appointed Representative Agreement
- Golden Charter's Funeral Plan Handbook

All of our employees involved in the quotation, selling and administration of Golden Charter funeral plans will be aware of and follow this policy.

This policy is reviewed annually by L. W. Clutterbuck Ltd and the outcome of the review is reported to Golden Charter in a formal declaration.

If we change our funeral plan pricing policy outside of our annual review, we will notify Golden Charter within 30 days.

Distribution list:

- All staff involved in selling funeral plans are named below

Version	Document owner (name and title)	Date prepared/reviewed	Next review date
1.0	Jeremy Clutterbuck, Director	29/7/24	<a href="#">29/7/25</a>

## 1. Pricing Principles

In determining a suitable pricing structure for Golden Charter's Independent Way funeral plans we will take into account the FCA Principles for Business, the customer's best interest rule and the requirement to provide fair value for customers.

We will carefully consider the pricing structure relating to funeral plan products, particularly whether:

- costs, charges and fees are compatible with the needs, characteristics and objectives of our customers.
- costs, charges and fees are transparent, charges are not disguised and information is straightforward and easy to understand.
- our prices quoted are in line with equivalent at need pricing and if not, there is an objective and reasonable basis for any difference,

We will:

- evidence why we believe our pricing structure is compatible with the needs and objectives of our customers;
- detail any remuneration received and how we will disclose this to customers;
- disclose any administrative fees charged by Golden Charter in connection with the contract;
- disclose, if applicable, our funeral director arrangement fee;
- confirm that our pricing structure complies with the customer's best interests rule;
- provide sample documents showing how the funeral plan price will be broken down and shown to customers.

## 2. Pricing Rules

The following rules will be available and adhered to by all employees involved in the selling and delivery of services contained within funeral plans.

- Funeral plan pricing will be determined by the scope of services included within the 'Independent Way' funeral plan and will always deliver fair value.
- Funeral pricing will be based on the equivalent at-need funeral prices, plus the Golden Charter arrangement fee.
- If there is a difference between the price of a funeral plan and an equivalent at-need funeral, we will explain to the customer at the point of sale the reasonable and objective basis and record the rationale.
- Any price discounts which may be offered will have defined start and end dates, appropriate customer terms and conditions and will conform to all required legislation.
- Any discounts will be applied equitably and made available to all eligible customers
- Prices quoted will include VAT (where applicable).
- If we offer the Independent Way guarantee, any binding promise will be clearly explained and costed into the funeral plan and will conform to the Golden Charter process.
- Where we include a Funeral Director Arrangement Fee to cover our time for making arrangements with the customer, this will be disclosed and paid directly to us and will not be included in the overall price of the funeral plan. The maximum amount that can be charged is set by Golden Charter at £325

We will hold an annual internal review and approval process for the pricing of funeral plans and the acceptance and adherence of this policy will form part of our employee funeral plan training.