

VULNERABLE CUSTOMER POLICY

This policy was last updated on Monday 18th July, 2022

The purpose of this policy is to ensure that the operations of Emelda Grace Limited do not have any negative impact upon vulnerable customers.

For the purposes of this policy vulnerable customers are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we sell and provide our services to ensure that they are not disadvantaged in any way.

What is a Vulnerable Customer?

The Financial Conduct Authority (FCA) defines a vulnerable customer as “someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care”.

The FCA expects firms like ourselves to treat customers fairly when we are dealing with people with vulnerable circumstances.

Identifying a Vulnerable Customer

Our staff are trained to identify vulnerable customers so we can take extra steps to assist outside of our standard procedures. However, it is not always possible to recognise these characteristics. Therefore, if you believe you may fit the criteria for a vulnerable customer, please read this policy and notify us immediately of your particular needs.

Vulnerability Groups

We recognise that certain groups of customers may be vulnerable. Whilst not all customers in these groups may be vulnerable, we will consider a customer’s individual circumstances where a potential vulnerability is identified. These groups may include, but are not restricted to:

- Customers with communication difficulties (including learning difficulties and English not being their first language, dyslexia)
- A customer with a reduction in physical or mental capacity
- Customer with health issues – illness, whether physical or mental illness, severe or long term
- A sudden diagnosis of serious illness to the customer or close family member
- Personal circumstances of the customer – factors such as financial difficulties, bereavement, caring responsibilities or redundancy
- The customers age particularly older and younger people. For example, a younger person may be considered inexperienced and the older person may be less technologically able

Our Key Principles When Engaging with a Vulnerable Person

As soon as we think we may be engaging with a vulnerable customer, whether this is through our identification or you are approaching us, we will:

- Immediately make a record of this and ensure we adhere to this policy
- Provide additional opportunities for you to ask questions about the information that has been provided
- Continuously seek confirmation that you have understood the information that has been provided
- Ask if there is anybody with you who is able to assist. If not, and we believe this will be beneficial, we will make arrangements to continue with the subject matter at another time
- Offer you the opportunity to complete the transaction after a period of further consideration

If we can’t help a customer, we will try and make sure that they understand what alternative options are available to them.