

Vulnerable Customer Policy

This document provides guidelines for working with vulnerable customers.

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1 WHO WE ARE

Evergen Power LTD

2 PRINCIPLES OF BUSINESS 6 AND 7

Any firm regulated by the Financial Conduct Authority (FCA) is bound by its 'Principles for Business'. The following Principles are directly relevant to Vulnerable Customers: 6 & 7:

Principle 6 A company must pay due regard to the interests of its customers and treat them fairly.

Principle 7 A company must pay due regard to the information needs of its clients and communicate information to them in a way which is clear, fair, and not misleading.

The company ensures that they:

- Understand the needs of the target market/customer base.
- Have the right skills and capability to recognise and respond to the needs of vulnerable customers.
- Respond to customer needs throughout product design, flexible customer service provision and clear and not misleading communications.
- Continue to monitor and assess that we are meeting and responding to the needs of customers with characteristics of vulnerability and make improvements where this is not happening.

As a business it is our responsibility to ensure we comply fully with the FCA regulation.

3 OUR VULNERABLE CUSTOMER POLICY

This policy sets out the approach to identifying and interacting with vulnerable customers to ensure fair customer outcomes. A "fair customer outcome" is a wide definition and does not just relate to providing the wrong goods and services, it includes instances which cause or could cause distress and inconvenience. The purpose of this policy document is to define what constitutes a vulnerable customer; how customers will achieve a fair outcome; details the controls that ensure adherence to the vulnerable customer policy and how vulnerable customer consideration will be used to drive business improvements.

4 UNDERSTANDING THE NEEDS OUR TARGET MARKET/CUSTOMER BASE

The customers' journey is made easier by having conversations about their requirements and desired outcomes and then offering them a few solutions for them to choose from. This conversation will consider their environment and plans. A written quotation is offered to every customer with a summary of our findings. This will be unregulated work. The regulated work will be brokering the finance options to them by introducing them to a lender and taking them through the application process. We ensure fair treatment for our customers by offering all customers the same journey. Every customer will be informed about the unsecured credit facility even if they wish to pay using cash. We will be able to leave with them, via trade quote, a written quote showing all the finance products that we offer.

Risks identified in the home improvement industry include mis selling, pressure selling, overselling, the customer being made to feel obligated, and overpricing.

The company are aware that a vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care. Vulnerable consumers may be at greater risk of harm, particularly if things go wrong. So, the level of care that is appropriate for these consumers may be different from that for others.

Our target customer base is property owners with an age range from late twenties to retirement age. Due to the nature of our business, our customer reasoning for making their purchase could be necessity, environmental, cost saving,

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adding value to their property, low maintenance solution for their energy provision or future proofing their property and value.

Our products and services are the same for all our customers, and we do not offer any 1:1 specials or discounts, every customer, being vulnerable or otherwise, will have access to all of our products and services. The unsecured consumer facility we will offer our customers will be a brokerage model, so we will be providing information to the customer regarding the lender and their terms and conditions. We will act solely as a broker and not a lender and this will be conveyed to all our customers in writing and verbally.

Often as individuals we will try to design ways to address specific vulnerabilities, when in fact a need-based approach is required as two customers with the same vulnerability may have very different needs. Using the following tools to better understand our customers' needs:

Speaking to them slowly, clearly and explain fully whilst conducting in-depth discussions to identify their needs before the initial appointment in their home takes place. Remember not to rush as it may sometimes take the consumer time to get relevant information together such as account details. Understand the type of home they live in, identify their income/employment/budget status, any requirements for access and mobility. Remember to be patient and empathise where appropriate. Always keeping the subject under discussion so not to bombard the customer with too much information. Allowing adequate time for the appointment and making it unscripted.

Constantly reviewing the different types of vulnerability, including the scale of the different areas geographically as well as drivers and characteristics of vulnerability.

Using information published by the Financial Conduct Authority (FCA), charities and trade bodies on the drivers and impact of vulnerability, and on how COVID-19 has impacted consumers' circumstances.

Working with third party organisations to gain insights into the experiences of customers, Ofgem, FCA, Trading Standards, for example, simulated experiences which show how it feels to live with certain conditions.

Analysing internal data which may include customer transactions, record vulnerabilities and needs, product utilisation and complaints.

Using external data sources such as ONS data, economic forecasts, and credit bureau data to help position groups of customers on a spectrum of risk in that all customers have the risk of becoming vulnerable but that this risk is increased by the presence of the characteristics of vulnerability highlighted in our policy.

Having identified that some of the drivers and characteristics of vulnerability may overlap and the scale of vulnerability is considered for all prospective customers. The concern about vulnerability is that it impairs the ability of an individual to best represent his/her own interests.

Examples of the types of harm that vulnerable customers may suffer include:

- Financial exclusion. For example, an inability to access basic retail banking services.
- Disengagement or partial exclusion. For example, customers who do not have the wherewithal to switch product/service despite an introductory deal having lapsed and the associated costs having substantially increased.
- Inability to manage a product or service. For example, customers that cannot make a complaint should a service or product not be as expected.
- Buying inappropriate products and exposure to mis-selling.
- Scams and financial abuse.

It is recognised that there may be a feeling of awkwardness or fear when having conversations around issues such as mental or other forms of illness, stressful situations and dealing with customers who may be distressed. Therefore,

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It may be easier to not encourage customers to disclose vulnerabilities. However, we will aim to remove as much of this fear as possible, via increased understanding, clear guidance on how to respond.

To spot the signs of vulnerability we will use as a prompt for reflection and further investigation:

- Appearance and atmosphere: what you see first, i.e., the condition of the property and including physical problems such as physical disabilities.
- Behaviour: what the individuals are doing, and if this is appropriate behaviour given the situation.
- Communication: what individuals say and how they say it.
- Danger: whether individuals are in danger and whether their actions put other people in danger.
- Environment: where they are situated, whether anyone else is there and what impacts the wider circumstances may have on the individual's health and safety.

An example:

When we work with customers with low literacy, numeracy, and financial capability skills I ensure that the customer understands everything I am saying. This may mean we have to repeat the information several times, and we may have to leave the information and quote in writing for them to discuss with a relative or friend. We always offer to read the contractual agreement with the customer and put nothing in 'small print. We have found a good test that the customer understands by asking them to tell us in their own words what they have purchased.

5 THE CONSUMER DUTY

Vulnerable customer awareness goes hand in hand with treating customers fairly and ensuring adequate consumer protection. In accordance with Consumer Duty, the firm has carried out an assessment of the nature and scale of characteristics of vulnerability that exist in our sector and within the target market operated in.

The company goes above and beyond considering generic customer vulnerabilities, that are person or situation specific and reviewing and monitoring vulnerabilities and characteristics that apply because of the target market. There are policies, controls, and tools to comply with the Consumer Duty and specifically the requirements contained in PRIN 2. Customer interests are considered from product/service design through to after-sales care and everywhere in between.

The Consumer Duty aligns with the guidance for firms on the fair treatment of vulnerable consumers and aims to improve outcomes for customers in vulnerable circumstances. The firm is committed to ensuring that good outcomes are attainable for all customers, regardless of circumstance, situation, or vulnerabilities.

6 THE EQUALITY ACT 2010

In its aim to ensure adequate and fair customer protection, the Consumer Duty requires that the needs of customers in vulnerable circumstances and customers with protected characteristics under the Equality Act 2010 are considered. This includes developing and implementing policies, controls and tools that meet the needs of customers with protected characteristics, as defined by The Equality Act 2010.

We are aware that certain groups of customers may have, or are more likely to have, characteristics of vulnerability. These groups can often share a protected characteristic which could result in vulnerable circumstances. Continuously monitoring the outcomes of all customers and reviewing the associated management information on a regular basis. Where there is a pattern or any evidence that customers that share a protected characteristic are more susceptible to experiencing harm from our products or services, we carry out an assessment and ensure that we are complying with both the Equality Act 2010 and the Consumer Duty.

7 VULNERABLE CUSTOMER AND DRIVER OF VULNERABILITY

In its latest guidance consultation paper, the FCA has identified four key drivers which it believes may increase the risk of consumer vulnerability. All of which could be potential customers of a home improvement company, and these are:

Drivers and characteristics of vulnerability		
Driver	Example	Characteristic
Health	Health conditions or illness that affect your ability to carry out day-to-day tasks.	Physical disability. Severe or long-term illness. Hearing or visual impairment. Mental health condition or disability. Addiction. Low mental capability or cognitive disability.
Life Event	Bereavement, job loss or emotional shocks.	Retirement. Bereavement. Income Shock. Relationship breakdown. Domestic abuse (including economic abuse). Caring responsibilities. Other circumstances such as leaving care.
Resilience	Low ability to withstand financial or emotional shocks.	Inadequate (outgoing exceed income) or erratic income. Over indebtedness. Low savings. Low emotional resilience.
Capability	Financial capability, low knowledge of financial matters or confidence in managing money. Low capability – in other areas e.g., literacy or digital skills.	Low knowledge or confidence in managing finances. Poor literacy or numeracy skills. Poor English language skills. Poor or non-existent digital skills. Learning difficulties. No or low access to help and support.

8 TYPES OF VULNERABILITY IN OUR SECTOR

Vulnerability can come in a range of guises, and can be temporary, sporadic, or permanent in nature.

To address the needs of vulnerable customers correctly, it is important to be able to identify them. In many cases, more than one risk factor is present which increases the consumer's vulnerability.

We are open and transparent with a vulnerable person's representative / carer and will offer additional help and information where required. For example, if someone is recently bereaved, has the power of attorney or a third-party mandate, we will ensure they receive consistent communication and treatment.

It is a fluid state that needs a flexible, tailored response from us. Many people in vulnerable situations would not diagnose themselves as 'vulnerable.' The clear message is that we can all become vulnerable and enable us to identify potential vulnerability and prioritise our efforts, we use a risk factor approach.

Certain risk factors are particularly important:

- Low literacy, numeracy, and financial capability skills.
- Physical disability.
- Severe or long-term illness.
- Mental health problems.
- Low income and/or debt.
- Caring responsibilities (including operating power of attorney).
- Being 'older old' for example over eighty, although this is not absolute (may be associated with cognitive or dexterity impairment, sensory impairments such as hearing or sight, onset of ill health, not being comfortable with modern technology).
- Being young (associated with less experience).
- Change in circumstances (e.g., job loss, bereavement, divorce).
- Lack of English language skills.
- Heightened stress levels due to difficult or different personal circumstances.

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- Time pressure is due to additional responsibilities.
- Increasing pre-occupation (brain is elsewhere') limiting their ability to manage.
- Non-standard requirements or credit history (e.g., armed forces personnel returning from abroad, ex-offenders; care-home leavers, recent immigrants).
- Their property may be in a poor state of repair, and the cost of the improvement may out way the value of the property.

The company understands that not all products are suitable for all properties, which is why it is important for a site visit to quote before installation.

Other factors which will be considered for suitability of product:

- They may have a disability which requires more specialised products that we don't offer.
- Their culture means they will not want to finance the products.
- They may have a limited amount of income to pay for the goods either with 'cash' or finance.

A change in personal circumstances can cause a customer to fall into a vulnerable situation even more so if the customers already have one or more risk factors.

People are particularly at risk where they have a need to replace things within their homes and at the same time, they experience a change in circumstances that often leads to financial shock.

This shock could be an unexpectedly large expense or a loss of income. A drop in income, or income volatility, can cause problems due to the ongoing commitment presented by many financial products. A reduction in the ability to meet these financial commitments can cause both immediate and longer-term problems.

In some instances, vulnerability and the associated stress can influence people's emotional state, cognitive ability, and ability to function. The company may experience this with customers, feeling stressed and anxious, feeling unable to cope, to upset to talk, finding it difficult to concentrate, think clearly, assimilating information, and make decisions, and finding it difficult to deal with new or unfamiliar tasks.

In these conditions, the impact of a problem or difficult interaction can be magnified, and vulnerability to unscrupulous practices is increased, creating a vicious circle. The individual's practical ability to seek redress may also be diminished.

It will be discussed with each customer when a specific vulnerability or concern for one is identified, to ensure their individual's needs and requirements are met and actioned. All actions are documented as shown in the customer journey within this policy.

9 TRAINING AND SKILL SETTING

Building knowledge of the various vulnerabilities will encourage an appreciation of what life can be like for some people in difficult circumstances and a desire to help. Being aware of how to spot warning signs or triggers and knowledge of where to signpost/refer to appropriately. An example of a warning sign could be that the customer is not able to concentrate to information given, which we will become apparent when we ask the customer to reiterate it back, this could be a sign that the customer has a lot else going on and may not be in a position to decide which will have a financial impact.

Managing a disclosure from a client and the different forms of communication needs of customers, as well as the internal recording of that information as these things play a key role for our customers to have a good journey with us and are helpful to staff.

Customers in vulnerable circumstances are often reluctant to proactively disclose details of their circumstances, due to the highly personal and sensitive nature of the issues. Effective listening and questioning skills are important to enable potential issues to be detected and explored, whilst providing reassurance and support to the customer. A culture of

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sensitivity and empathy when speaking with potentially vulnerable customers help to facilitate a more positive customer experience and will be more likely to result in a positive outcome.

Avoiding rigidly scripted responses gives the flexibility to allow a conversation to develop if they sense that a customer may be having trouble.

Other training and reviewing of skill set will include:

- Treating Customers Fairly which includes a PowerPoint and knowledge assessment.
- How we assess our target market and potential vulnerability.
- Drivers and characteristics of vulnerability include types of vulnerability and policy.
- Customer care calls and documenting information on our customer system and files and practical training.
- Finance training by the lender.
- Complaints Procedure using the policy and procedure.
- Point of Sale material including product/services demonstration, survey/measuring, customer contract completion.
- After Sales/Post Contract Communication reviewing customer care calls regarding customer satisfaction/complaints handling, how the product is working/performing, warranty details for the product and installation, terms, and conditions in the contract.
- Data Protection/GDPR policy and procedures, external sources ICO.

10 FINANCE PRODUCTS

Finance products will only be available from a lender partner. These products are subject to the lender's terms and conditions; however, always acting appropriately with all customers, in particular vulnerable customers, in introducing them to finance products that are suitable to them and their circumstances. Their understanding of the finance product, ability to pay the lender, and the ownership of the property.

This facility will hopefully include a variety of payment structures. As an example, for this business plan, the Unsecured Consumer Credit Facility product specification could look like this for, as an example, Loans from £1,000 to £75,000:

- Joint applications recommended
- Repayment terms from 1-15 years
- Wide range of APR options (0.0% to 15.9% APR)
- Homeowners only accepted
- Available throughout England, Wales, and Scotland
- Borrowers aged 21 at the point of application to 85 at the end of the loan duration
- Self-employed, retirement and some benefit incomes acceptable
- Overpayments accepted without additional charges
- Maximum early repayment charges of one month's notice and one month's interest
- Do not charge arrangement fees to customers.

It may be appropriate to signposting some vulnerable customers to an external organisation that can provide expert advice, guidance and support for them and their family or friends, if they have their support, who are independent and free of charge. This can range from providing the customer with contact details of the relevant external organisations to enable our customers, who may need or want additional help and support, to enabling them to make contact at a time that suits them or depends on the customer's circumstances. Referring to the organisational directly so that the customer does not have to make an additional second call. Please see Appendix A for contact for assistance by external organisations.

11 CUSTOMER JOURNEY

At the beginning of recognising the customers' vulnerabilities the following will happen:

- Immediately make a record on their customer file, this will help us as a firm and ensure the customer does not need to keep repeating themselves.

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- Ensure we adhere to this policy; this may mean reading this policy and referring to it.
- Discuss with the customer their requirements, their desired outcome, and their future. We need to establish that the product is right for the customer. Products are designed for property improvements to make properties run more efficiently and we need to ensure the customer has the same expectations.
- Never make the customer feel rushed or pressured into deciding and we will ensure the information provided is objective.
- Ensure there is flexibility in product demonstration and information available i.e., larger print / google translate.
- Provide additional phone calls to confirm each stage with the customer on their journey, ensure the customers have an opportunity to ask questions about the information, such as quotations, surveys, or a customer contract we have provided.
- Continuously seek confirmation that customer has understood the information that has been provided by asking the customer to tell us in their own words what they are purchasing / agreeing too.
- Ask if there is anybody who can assist the customer in their decision making, this is sometimes beneficial also to have a second opinion, ensuring the product is right for the customer. If not, and we believe this will be beneficial, we will either make an alternative appointment time or suggest to the customer that they review this purchase at another time when they can be supported through the purchase.
- Ensure information that is available for the customer is clear, fair, and not misleading, providing examples.
- Offer customers the opportunity to complete the sale after a period of further consideration.
- Ensure the cooling-off period of 14 days is allowed and during this time call the customer to ensure they are still happy to go ahead with their purchase.
- Call the customer or arrange a site visit after installation to check if the customer knows how to use the product.
- If it is suspected that the customer is in financial difficulty, a discussion around their home improvement requirements priorities will take place.
- If suspect suspicious activity is recognised proactive reporting will take place.

A sale will never be completed if it is not felt right for the customer, a lot of time is taken getting to know the customer and this is especially heightened when working with vulnerable customers. If it is felt the product is not right, an explanation will be given and if possible offer an alternative supplier or a solution i.e., if someone has just been made redundant but is about to start a new job, we would suggest that they are settled with their new employer for the probation period at least before discussing the sale further or instead of using their redundancy package, wait until they are secure in a new employment for financial security.

When a customer works with the company, they will go through the journey of having the initial call, an appointment made to discuss their requirements, we will discuss information with the customer and if they decide to go ahead, make an appointment for installation. A project officer is assigned to the customer and will schedule a call with the customer to check they are happy with their installation, and it is all working.

The following considerations are always in place, to ensure all customers are treated fairly:

- Understanding the needs of our target market/customer base prior to any appointment that will take place in a customer's home. This includes discussing their property type, desired outcomes for the short- and long-term vision and their needs. Detailed notes are kept and form part of the customer's file.
- Responding to customer needs throughout the product sale and installation design, flexible customer service provision and communications. All contracts and quotations are in writing. This may be sent in the post, emailed, or given on the day of the visit. Any changes will be in writing showing exactly the change and may also be subject to change when the full survey is completed.
- Monitor and assess whether the customers' needs are being met.

There is a choice of ways of communicating available whenever customers need to contact us, and these are designed in an inclusive way so that they are flexible, clear, easy to understand and meet the customers' needs. This may be via phone calls only, email in writing, in some cases they may want us to communicate with a family or friend directly, whichever best suits our customers.

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Everyone is bound within an individual set of circumstances, and our responses are tailored accordingly. The firm will always listen carefully, let the conversation take its course without judgement and ensure the message from the customer is clearly understood before undertaking any actions.

12 MONITORING AND ASSESSING THE NEEDS OF VULNERABLE CUSTOMERS

Continuous assessing of all customer files, including their contract, method of payment, if any credit agreements on a weekly basis to identify if any customer has developed financial difficulties during their contract period. This ongoing monitoring includes: -

- Contact any customer who has missed or delayed their deposit payment (if applicable).
- Flagging a customer that has delayed their installation.
- Flagging the customers that have been identified as vulnerable.
- Where the customer has a third party to support them through the sale.
- Any contract that has been repriced due to survey errors.
- Customer complaints through the customer's sales journey.

All customer journeys are monitored and there are systems in place to identify those that fall within the vulnerable customer sector, all customers are treated fairly and review the outcomes vulnerable customers experience in comparison to other customers.

Products are constantly reviewed and tested with vulnerable customers in mind to ensure positive outcomes. Along with consideration for the number of customer touchpoints throughout a product's lifecycle; if communication with the customer is scarce it becomes very difficult to determine a change in circumstance and react accordingly. Any changes notified by a customer will be added to their customer file. The number of updates / phone calls will all be recorded so when evaluating the customers' journey, I can implement improvements to other customers.

For our FCA compliancy requirements we are aware that management information is needed on an annual return, and we will add to these details of vulnerable customers that have used the unsecured consumer facility for our own reference. All data will be collected and stored securely for reporting purposes.

It is our intention to diligently record information properly so that customers do not have to be repetitive if they contact us later and we are able to refresh our understanding prior to making any further contact with them.

The company carries out regular internal audits and gap analysis monitoring on all business practices and procedures to ensure that our Vulnerable Customers ethos and objectives are met. These audits include using a Vulnerable Customer Audit Checklist (appendix B) which enables us to assess every policy and procedure area against assessment questions designed to test our Vulnerable Customer processes and regulatory compliance.

Policy Statement

Dale Williams, the DIRECTOR, and senior manager of the company is responsible for Vulnerable Customer audits and monitoring. There is a continuous audit trail of all Vulnerable Customer audits and feedback to ensure continuity through each process and task.

13 APPENDIX A CONTACT FOR ASSISTANCE BY EXTERNAL ORGANISATIONS

Area	Support
Debt management	<p>Money Advice Service - 0300 500 5000 Free confidential advice to improve finances, keep track and plan www.moneyadvice.org.uk</p> <p>Money Advice Scotland - 0141 572 0237 Free confidential debt advice for customers that live in Scotland www.moneyadvice.scot.nhs.uk</p> <p>Advice NI – Debt Action NI - 0800 917 4607 Free confidential debt advice for customers that live in Northern Ireland www.debtaction-ni.net</p> <p>Christians Against Poverty (CAP) - 0800 328 0006 Working with the church to release people of debt and poverty www.capuk.org</p> <p>National Debt line - 0808 808 4000 Free confidential advice service run by the charity Money Advice Trust www.nationaldebtline.co.uk</p> <p>StepChange Debt Charity - 0800 138 1111 Free confidential debt advice and debt management www.stepchange.org</p>
Suicidal / Distressed	<p>Samaritans – 116 123 Free confidential service that helps people experiencing tough times. Help people explore their options, understand their problems better, or just be there to listen. www.samaritans.org</p>
Disability / Minority	<p>AdviceUK - 0300 777 0107 Specialist advice for people with disabilities and minority communities www.adviceuk.org.uk</p> <p>Royal National Institute of Blind People (RNIB) - 0303 123 9999 Offers practical and emotional support for people losing their sight, blind or partially sighted www.rnib.org.uk</p>
Legal Advice	<p>Civil Legal Advice - 0845 345 4345 Help meet the costs of legal advice and representation in court, if eligible www.gov.uk/legal-aid</p>
General Advice and Support	<p>Citizens Advice Free confidential advice whatever the issue (not just debt) www.adviceguide.org.uk or visit their local Citizens Advice Bureau</p>
Complaints	<p>Financial Ombudsman Service - 0300 123 9123 / 0800 023 4567 Free review of complaints that businesses are not able to resolve www.financial-ombudsman.org.uk</p>

14 APPENDIX B - VULNERABLE CUSTOMER AUDIT CHECKLIST

Client Name: Client Address: Review Date:	HEALTH		RESILIENCE		LIFE EVENTS		CAPABILITY		ASSESSMENT		
	the ability to carry out day-to-day tasks?		ability to withstand financial or emotional shocks?		redundancy bereavement, relationship breakdown, in last year?		level of financial matters / confidence in managing money?		Fair treatment of clients in vulnerable circumstances /Capacity.		
									R	A	G
I have considered how the client is assessed against our vulnerability policy.	Y	N	Y	N	Y	N	Y	N			
I will actively seek to encourage disclosure about potential vulnerability.	Y	N	Y	N	Y	N	Y	N			
I have reflected my approach in an appropriate way in my documentation.	Y	N	Y	N	Y	N	Y	N			
I have discussed my approach with other professionals.	Y	N	Y	N	Y	N	Y	N			
CLIENT – NEW											
I have considered what, if any, additional information I should be gathering when providing advice in the first instance.	Y	N	Y	N	Y	N	Y	N			
I have sought to understand any unusual aspects, for example: why someone else is accompanying a client? I’m aware of the potential for any conflict of interest or undue influence.	Y	N	Y	N	Y	N	Y	N			
I understand who my client is and the extent of the instructions I am able to act on, for example: under a Power of Attorney.	Y	N	Y	N	Y	N	Y	N			
CLIENT - EXISTING											
I have considered whether the client is acting differently/showing signs of a change of character.	Y	N	Y	N	Y	N	Y	N			
I have a set of questions to check client memory recollection (if required).	Y	N	Y	N	Y	N	Y	N			
If working with more than one person, I’m aware of the potential for any conflict of interest or undue influence.	Y	N	Y	N	Y	N	Y	N			
I’ve confirmed any change in circumstances which might lead to vulnerability, for example: having to take on caring responsibilities.	Y	N	Y	N	Y	N	Y	N			

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ADVICE											
Do the client's stated needs and objectives align with their current circumstances? For example: question why a client would be seeking to make this purchase if there is an immediate debt due.	Y	N	Y	N	Y	N	Y	N			
I have considered whether my normal advice process is appropriate to this client's needs.	Y	N	Y	N	Y	N	Y	N			
I am able to identify financial products that I believe are clear and easy to understand for those showing signs of vulnerability.	Y	N	Y	N	Y	N	Y	N			
PRESENTATION											
I have recognised whether there's a need to adjust the delivery and format, for example: provide a suitability report in large print.	Y	N	Y	N	Y	N	Y	N			
I have sought to explain issues/solutions with a limited use of jargon.	Y	N	Y	N	Y	N	Y	N			
TAILORING											
I have taken the time to listen, to identify vulnerabilities and, if appropriate, will suggest that someone else forms part of the advice process and/or refer to a specialist.	Y	N	Y	N	Y	N	Y	N			
I have flexibility around appointment locations, for example: at the client's home, times of the day and their duration.	Y	N	Y	N	Y	N	Y	N			
I have taken account of the complexity of the advice being delivered and made reasonable adjustments, for example: staggering the advice over several meetings and/or given greater time to reflect before making a purchase.	Y	N	Y	N	Y	N	Y	N			

R	Customers are currently at a heightened risk of experiencing detriment compared to the majority of vulnerable customers. The potential for serious/negative impact to their current situation is imminent. Special attention required when processing this case to achieve best outcome.
A	Customers are currently in a situation where they are more likely to experience harm, loss, or disadvantage in comparison to other customers.
G	Customers are currently able to manage their finances, make informed decisions, and is not at risk of detriment due to their situation. Awareness of vulnerability is all that's needed.