



EdenTree Investment Management Limited

Consumer Duty Statement

Introduction

EdenTree Investment Management (EdenTree) is a leading responsible and sustainable investment manager in the UK and has been managing ethical funds since 1988. The high standards we expect from the companies we invest in is reflected in our own business and the manner in which we aim to do business with all of our stakeholders, from suppliers to distributors and consumers.

At EdenTree, we are fully committed to supporting the Financial Conduct Authority's (FCA) regulatory agenda for retail customers, which is to ensure firms have products and services that meet the needs of retail customers and offer fair value throughout the life cycle of the product.

The introduction of the new Consumer Duty rules that come into force on 31 July 2023, replacing the existing FCA requirements to Treat Customers Fairly, clearly sets out the FCA's higher expectations on the standards of care retail customers receive. As a specialist investment manager with over 30 years' experience in responsible & sustainable investment our objective is to deliver 'Performance with Principles' for our customers. Consumer Duty is therefore aligned with our culture and strategy.

Under the new Consumer Duty rules the FCA has replaced Principal 6 and 7 with Principal 12, which states firms must act to deliver good outcomes for retail customers.

The FCA expects firms to act in good faith, avoid causing foreseeable harm and enable and support retail customers to pursue their financial objectives. These are known as the cross-cutting rules.

Firms must embrace four consumer focused outcomes which are:

1. Products and Services
2. Price and Value
3. Consumer Understanding
4. Consumer Support

The key policies we have in place to support our compliance with consumer duty are the Product Governance Policy and the Distribution Policy.

The Product Governance Policy seeks to ensure our products are monitored and managed appropriately all the way through the product life cycle.

The Distribution Policy seeks to ensure that we communicate our target market to our distributors and adequately monitor and manage this channel of data and communication.

What do these outcomes mean to EdenTree Investment Management?

Outcome 1 : Products and Services

EdenTree has in place a formal governance structure to ensure its products and services

are regularly reviewed and deemed suitable for our target market. New products, and any changes to existing products, must first be approved by the Product Governance Committee before being recommended to the EdenTree Board for approval.

We will clearly identify the target market for all our products and make it clear for whom our products are suitable. Information on target markets will be displayed on our website and made available to our distributors and IFA networks in accordance with our distribution policy.

We will make sure our products are well designed, simple and easily understood by our retail customers and that marketing materials are clear and transparent. We closely monitor the performance of our products to ensure they are managed and administered in line with stated objectives and continue to meet the needs of customers as well as reviewing the appropriateness of our products to ensure that they remain fit for purpose and deliver the needs of our target markets. We will take appropriate action if any concerns are identified.

Outcome 2 : Price and Value

In accordance with the Collective Investment Schemes Sourcebook (COLL) rules, EdenTree produces an annual Assessment of Value for each of its funds. The report is published on our website by 30 April each year and assesses individual fund performance and investment process, as well as costs and charges and quality of service, and includes peer comparisons.

In particular, EdenTree prides itself on the level of engagement and research undertaken as part of our Environment Social and Governance (ESG) screening process, where we believe we deliver added value.

Costs and charges are evaluated on an ongoing basis. As a relatively small asset manager we are not always able to take advantage of economies of scale but look to ensure our fees offer value to our customers and are in line with our peers.

Outcome 3 : Consumer Understanding

As the product manufacturer, we have a duty to ensure that the information we provide to customers, whether direct or via an intermediary, is accurate, simple to understand and fully transparent, enabling investors to make an informed decision based upon their personal circumstances.

We will provide customers with appropriate information and communication for the duration of their relationship with us, i.e. before, during and after the point of sale. When preparing information, we aim to provide it in a format that is fair, simple to understand and fully transparent. Investors should receive communications which enable them to make informed decisions and receive the support they need.

To meet the enhanced requirements of Consumer Duty we have completed consumer testing on key documents to ensure retail customers understand the exact nature of the products they choose to invest in. We will continue to do so in the future, particularly when we launch new products or implement changes to existing products. We also engage regularly with key Distributors to ensure they have the necessary information to sell our products to the agreed target market.

We seek regular feedback from retail customers to ensure they are satisfied that the products they have purchased meet their needs. This is achieved for example by customer surveys / questionnaires, monitoring of complaints and redemption levels. Where we do not have a direct relationship with the end customer we seek appropriate management information from our distributors.

Outcome 4 : Consumer Support

Once a customer has invested with EdenTree we aim to ensure that they continue to have access to information they require and that service levels continue to meet their expectations. As a firm we already measure ourselves against a set of customer conduct metrics and these form part of the firm's overall deliverables for financial remuneration.

We have a structured programme in place to ensure all relevant staff have been trained in Consumer Duty. In particular, we have looked at the additional support we can provide to vulnerable customers. Our vulnerable customer policy can be found on our website and provides information on the support available, and how customers can notify us of their requirements. We also have a number of Consumer Duty 'frequently asked questions' on our website.

Where customers decide that they wish to switch or exit a fund, we aim to make this as seamless as possible. We do not impose any unreasonable post sale barriers should clients wish to switch between products and /or providers.

We recognise that mistakes or errors can occur. Whilst this is rare, when mistakes are made, we will deal with any complaints promptly and fairly, making every effort to resolve them first time, achieving the right outcome for our customers. We will learn from complaints by completing a root cause analysis and implementing improvements where necessary.