

VULNERABLE CUSTOMER POLICY



1. INTRODUCTION

In accordance with the FCA rules EdenTree Investment Management Limited (EIM) and EdenTree Asset Management Limited (EAM), (together EdenTree) is required to establish, implement and maintain an effective policy to ensure that we treat all of our customers fairly and when dealing with people with vulnerable characteristics or circumstances we ensure the way we sell our products and provide our service does not cause them any harm or detriment.

As defined by the Financial Conduct Authority (FCA) "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"

The policy describes the arrangements that we have been put in place to try to identify customers who are at risk and to limit the consequences of harm by providing additional assistance where applicable to ensure a good outcome for those clients.

2. ACTIVITIES OF EDENTREE

EdenTree is part of the Benefact Group (formerly Ecclesiastical Insurance Group). The main activity of EdenTree is the provision of investment management services to both retail and professional clients, via our range of collective investment schemes. Although available to retail clients, EdenTree does not market directly to retail clients. Our funds are however widely available via our distributor network of Independent Financial Advisers (IFAs) / Wealth Managers and Platforms.

Investors should note that where they invest via our distributor networks, we will ensure that key distributors have appropriate customer care arrangements in place for vulnerable clients. Ultimately it is the responsibility of the Distributor to ensure they are meeting the regulatory requirements. For investors who invest direct, the day to day administration of our funds is outsourced to Northern Trust Administration Services Limited, who also have a Customer Care policy which reflects EdenTree's standards and values.

3. IDENTIFYING A VULNERABLE CUSTOMER CIRCUMSTANCES

Our staff and those of our administrator Northern Trust are trained to identify vulnerable customers and to provide the additional level of assistance they may require. It is not always easy to recognise the characteristics of vulnerable customers on all occasions. Therefore, if you believe you are a vulnerable customer, please do notify us as soon as possible of your particular needs.

We have identified the following groups which may be vulnerable, which include, but are not restricted to:

- Customers with communication difficulties e.g. English not first language, dyslexia
- Customers with a reduction in physical or mental capacity e.g. visual or hearing impediment
- Customers with health issues or sudden and unexpected diagnosis of illness
- Customers experiencing a change of personal circumstance e.g. bereavement, divorce, redundancy
- A customer's age e.g. older customers may be less technically able whilst younger people may be less experienced in financial affairs
- A customer has a little knowledge or understanding of financial services and investments products

4. PROCEDURES AND MEASURES TAKEN TO PROTECT VULNERABLE CUSTOMERS

As soon as we become aware a customer might be vulnerable we will immediately make a record of this.

We will:

- Be proactive where a characteristic of vulnerability is identified or indicated by the customer
 - When indicated, ask the customer what support they require
 - Where requested, liaise with Northern Trust to ensure the additional support is noted on the Register, so that they do not need to repeat their request
 - Ask the client if they have anybody who can assist or they would like to be present during calls etc
 - Provide additional opportunities for customers to ask questions
 - Seek confirmation that they have understood the information provided
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- If we cannot help a customer, we will try and make sure that they understand what alternative options are available to them

5. HOW VULNERABLE CUSTOMERS CAN IDENTIFY THEMSELVES

Customers who believe they are vulnerable should notify us by calling us on 0800 3583010, emailing us at edentreeimqueries@ntrs.com or writing to EdenTree Investment Management Limited, Sunderland, SR43 4AU.

6. FREQUENCY OF POLICY REVIEW

This Policy must be reviewed at least annually by the Executive Committee / Consumer Duty Steer Co taking into account any new or changes to legislation, or more frequently should a significant change in the business, market or regulatory environment occur.
