

Vulnerable Customer Policy

June 2025

1 Introduction

In accordance with the FCA rules EdenTree Investment Management Limited (EIM) and EdenTree Asset Management Limited (EAM), (together EdenTree) are required to establish, implement and maintain an effective policy to ensure that all of our customers experience good customer outcomes. We must ensure the way we sell our products and provide our service does not cause them any harm or detriment. We must also make provisions to ensure that vulnerable customers are also able to obtain the same levels of care, support and good service.

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 identify and additionally protect vulnerable customers.

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 a distributor network of Independent Financial Advisers (IFAs) / Wealth Managers and Investment Platforms.

Investors should note that where they invest via the distributor network, 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 directly, 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 needs. We will act with empathy, discretion, and respect when supporting you.

We have identified the following potential drivers of vulnerability , which include, but are not restricted to:

Health

- Customers with a physical disability or cognitive impairments e.g. dementia
- Customers with a reduction in physical or mental capacity e.g. visual or hearing impediment
- Customers with mental health issues, physical health issues or sudden and unexpected diagnosis of illness
- Customers with a severe or long-term illness

Life Events

- Customers experiencing a change of personal circumstance e.g. bereavement, divorce, redundancy, cost of living
- Becoming a carer

Resilience

- Customers who find themselves over-indebted
- Customers with an erratic income
- Customers with a lack of support network

Capability

- Customers with communication difficulties e.g. English not first language,
- Customers with limited digital skills
- Customers with limited understanding of financial matters
- A customer with limited numeracy and or literacy skills
- A customer’s age, different life stages can lead to financial vulnerability, and differing levels of financial confidence or ability

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 customer record, so that they do not need to repeat their request
- Ask the customer if they have anybody who can assist, or they would like to be present during calls etc
- Encourage financial advisers to disclose vulnerabilities in their clients
- Ensure our funds have the appropriate target market defined and are being sold to the right groups of people
- Where possible, extend timelines to work at the customer's pace
- Provide additional opportunities for customers to ask questions
- Signpost to specialist support organisations, where appropriate
- Seek confirmation that they have understood the information provided
- 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 358 3010**

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 considering any new or changes to legislation, or more frequently should a significant change in the business, market or regulatory environment occur.

7 What is EdenTree doing to comply with the Customer Support outcome?

Once a customer has invested with EdenTree we aim to ensure that they continue to have access to the information they require and that service levels continue to meet their expectations. As a firm we already measure ourselves against a set of core customer conduct metrics. Where we find issues and areas that we need to improve, we will make it a priority to fix them.

We have a structured programme in place to ensure all relevant staff have been trained in Consumer Duty and have improved awareness of customer vulnerability.

8 How is EdenTree supporting Vulnerable Customers?

When dealing with people with vulnerable characteristics or circumstances we look to ensure the way we sell our products and the provision of support, before and after the point of sale, do not cause them any harm or detriment. 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.

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calling us on
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or writing to
EdenTree Investment Management
Limited, Sunderland SR43 4AU

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