

GBIM

— GORE BROWNE —
INVESTMENT MANAGEMENT

Vulnerable Customers Policy Summary

Introduction

Vulnerable customers are customers or prospective customers whose ability or circumstances require us to take extra precautions in the way we sell and provide our services to ensure that they are not disadvantaged in any way. To support this Gore Browne Investment Management (GBIM) has a Vulnerable Customer Policy which is designed to ensure that the way GBIM conducts its business does not have a detrimental impact upon vulnerable customers. This document summarises the policy.

What is a Vulnerable Customer

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 FCA expects firms such as GBIM to treat all our customers fairly and when dealing with people with vulnerable characteristics or circumstances to take these into account to ensure that the way we sell and provide our services does not cause them detriment.

Identifying a Vulnerable Customer

Our staff are trained to identify vulnerable customers and to provide the additional level of assistance they may require in order to achieve a good outcome. For example, the majority of GBIM’s client facing Investment Managers are ‘Dementia Friends’ having received training from the Alzheimer’s Society.

However, it is not always easy to recognise the characteristics of vulnerable customer characteristics on all occasions. Therefore, if you believe you are a vulnerable customer, please read this statement and notify us as soon as possible of your particular needs. You are encouraged to do this when you first contact us.

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 customer’s 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 Approach when engaging with a Vulnerable Customer

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 we have provided
- Continuously seek confirmation that you have understood the information that has been provided

Salisbury Office

Chequers Court, 37 Brown Street, Salisbury,
Wiltshire, SP1 2AS - 01722 424444

Harrogate Office

Belvedere House, 2 Victoria Avenue, Harrogate,
North Yorkshire, HG1 1EL - 01423 508040

www.gbim.co.uk

- 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 discussion at another time when assistance is available
- Offer you the opportunity to complete the transaction/agreement 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.

Effective Date: 23/08/2021

Review Date: 23/08/2022