

The firm maintains a confidential Vulnerable Client Register to monitor and support clients identified as being in vulnerable circumstances. The register is maintained by the Compliance function and stored securely within the firm's internal systems.

1 PURPOSE OF THE REGISTER

The purpose of the Vulnerable Client Register is to:

- Monitor vulnerable clients across the firm
- Ensure appropriate support is provided
- Identify trends in vulnerability
- Assist with Consumer Duty outcome monitoring
- Support compliance reviews and audits

2 INFORMATION RECORDED

Where vulnerability is identified, the following information may be recorded:

- Client reference number
- Adviser responsible for the case
- Type of vulnerability identified
- Date vulnerability identified
- Support measures provided
- Whether the case was escalated
- Date of review

Sensitive personal information is handled in accordance with UK GDPR and the firm's Data Protection Policy.

3 SAMPLE REGISTER LAYOUT

CLIENT REF	ADVISER	VULNERABILITY TYPE	DATE IDENTIFIED	SUPPORT PROVIDED	ESCALATED	REVIEW DATE
VC-001	A. Brylka	Bereavement	10/02/2026	Extra time, written summary	No	10/05/2026
VC-002	T. Kowalski	Cognitive decline	18/02/2026	Family member present	Yes	18/04/2026

4 ACCESS TO THE REGISTER

Access to the Vulnerable Client Register is restricted to:

- Compliance Director
- Senior Management
- Relevant authorised staff where necessary

5 MONITORING AND REVIEW

The register is reviewed periodically to:

- Identify patterns of vulnerability
- Monitor outcomes for vulnerable clients
- Ensure advisers are providing appropriate support

This forms part of the firm's Consumer Duty monitoring framework.

6 LINK WITH CRM SYSTEM

Vulnerability indicators are initially recorded within the Pro System CRM under the client profile.

Where appropriate, the case may also be recorded in the Vulnerable Client Register for monitoring purposes.

7 IMPORTANT PRINCIPLE

Identification of vulnerability does not prevent a client from receiving financial advice.

However, it requires the firm to ensure:

- additional care
- clear communication
- appropriate support

are provided throughout the advice process.