

## PURPOSE

This document summarises the firm's framework for identifying, supporting and monitoring vulnerable clients.

Impact Financial Services recognises that clients may experience circumstances that make financial decisions more difficult. The firm has established a structured framework to ensure vulnerable clients receive appropriate support and fair outcomes.

This framework supports the firm's obligations under:

- FCA Consumer Duty
- FCA Principles for Businesses
- Treating Customers Fairly (TCF)

## VULNERABLE CLIENTS GOVERNANCE FRAMEWORK

The firm's approach to vulnerable clients is supported by the following policies and procedures.

### CORE POLICY

#### Vulnerable Clients Policy

Defines the firm's overall approach to identifying and supporting vulnerable clients. Sets out the firm's commitment to recognising vulnerability, the responsibilities of advisers and management, and the standards expected when dealing with clients who may be in vulnerable circumstances. This policy forms the foundation of the firm's vulnerability framework.

### ADVISER GUIDANCE

#### Vulnerable Client Identification Guide

Provides practical guidance to advisers on recognising potential indicators of vulnerability during the advice process. Covers the four key drivers of vulnerability defined by the FCA: health conditions, life events, resilience, and capability. Includes examples of situations advisers may encounter and how to respond appropriately.

### RECORD KEEPING

#### Vulnerable Client Register

Centralny rejestr służący do dokumentowania wszystkich zidentyfikowanych przypadków vulnerability w firmie. Zawiera dane klienta, rodzaj vulnerability, podjęte działania wspierające oraz status sprawy. Umożliwia management oversight i zapewnia, że żaden przypadek nie zostanie pominięty w procesie monitorowania.

### CLIENT SUPPORT PROCESS

#### Vulnerable Client Support Procedure

Explains how advisers should adapt their approach when supporting vulnerable clients during the advice process. Covers adjustments to communication, pacing of meetings, use of clear language, offering additional time for decision-making, and ensuring the client fully understands the advice being provided.

### ESCALATION PROCESS

#### Vulnerability Escalation Process

Defines when and how vulnerability cases should be escalated to management or compliance. Includes criteria for escalation such as significant client detriment risk, safeguarding concerns, cases where the adviser is unsure how to proceed, and situations requiring additional support or specialist referral.

### MANAGEMENT OVERSIGHT

#### Vulnerable Client Management Oversight Policy

Outlines how management monitors vulnerable client cases and supervises adviser activity in this area. Covers management review of vulnerability records, periodic case sampling, feedback to advisers on their handling of vulnerable clients, and reporting to compliance on vulnerability trends across the firm.

### CLIENT COMMUNICATION

#### Vulnerable Client Statement

Public-facing statement explaining how the firm supports vulnerable clients. Designed to be shared with clients and made available on the firm's communications. Sets out the firm's commitment to treating all clients fairly and the additional support available for those who may need it.

## SYSTEMS AND DOCUMENTATION

Vulnerability indicators are recorded within the firm's CRM system (Pro System) to ensure that advisers and management can provide appropriate support throughout the client relationship.

Documentation relating to vulnerability forms part of the firm's client file records.

## MONITORING AND REVIEW

The firm periodically reviews vulnerability cases through:

- file checking processes

- management oversight
- compliance reviews

This ensures the firm continues to deliver good outcomes for vulnerable clients.

## CONTINUOUS IMPROVEMENT

The firm may review vulnerability procedures periodically to ensure they remain aligned with FCA expectations and industry best practices.

### DOCUMENT CONTROL

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