



Vulnerable Clients Policy

August 2021

The facilities that we offer to trade in complex financial products, are of a highly speculative nature. As CFDs are complex instruments that come with the high risk of losing money rapidly due to leverage, it may not be suitable for clients who are classified as a vulnerable person.

The following list, which is not exhaustive, is an indication of those persons we feel that may fall within this category and who may not be suitable to trade the products we offer:

- Low literacy, numeracy and/or financial capability skills
- Physical disability that impairs the ability to act without cognitive or dexterity impairment, or sensory impairment such as loss of sight
- Severe or long-term illness
- Mental health problems, whether temporary (e.g. depression) or of a longer-term nature
- Low income with debt, or an excessive unsecured debt to income ratio
- Caring responsibilities for another (including operating a power of attorney)
- Age-for example over 75, although this is not absolute (may be associated with Cognitive or dexterity impairment, sensory impairments such as hearing or sight, onset of ill-health, not being comfortable with new technology)
- Being young (associated with less experience)
- Change in circumstances (e.g. job loss, bereavement, divorce)
- Non-standard requirements or credit history

For this reason, we ask that if you fall into any of these categories that we be advised of the situation as soon as possible. This does not preclude you from opening or maintaining an account, however we have to be assured that you are able to enter and/or maintain an account in this highly speculative arena.

If you do disclose any personal information about your requirements, the information will be recorded properly so that you do not have to repeat it again and all information provided will be recorded in conjunction with GDPR.

Additionally, should you experience a sudden change in circumstances in relation to any of the above, please do inform us as soon as possible and we will do our best to accommodate any

changes.

Involvement of a third party

If a third party contacts our company to let us know that a customer cannot manage their financial affairs for a while, because of, for example, a deteriorating health condition or a sudden crisis, we will make a note of the circumstances so that appropriate action can be taken when we can be in contact with the customer. This does not involve disclosing any information to the caller.

We will also want to use the information provided by a third party to investigate further and seek a separate conversation with the client as it may be important in preventing abuse as well as clarifying the customer's needs.