

VULNERABLE CUSTOMER POLICY

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Introduction

At different points in life – or even temporarily – individuals may need us to engage with them in a different way. This could be due to physical or mental health challenges, difficulties in understanding or managing finances, or the impact of a significant life event.

As a business, we are committed to identifying such circumstances and tailoring our support to meet our customers' needs with empathy and flexibility.

A vulnerable consumer is "someone who, due to their personal circumstances, is especially susceptible to detriment particularly when a firm is not acting with appropriate levels of care." (FCA Finalised Guidance FG21/1, 'Guidance for firms on the fair treatment of vulnerable customers')

FG 21/1 identifies four key drivers of vulnerability: Health, Life Events, Resilience, and Capability. The following risk factors, grouped under these drivers, are particularly important:

- Health: Physical disability
- Health: Severe or long-term illness
- Health: Mental health problems
- Life Events: Change in circumstances (e.g. job loss, bereavement, divorce)
- Life Events: Caring responsibilities (including operating a power of attorney)
- Resilience: Low income and/or debt
- Resilience: Non-standard requirements or credit history (e.g. armed forces personnel returning from abroad, ex-offender, care-home leavers, recent immigrants)
- Capability: Low literacy, numeracy, and financial capability skills
- Capability: Lack of English language skills
- Capability: Being young (associated with less experience) or being older (which may be associated with cognitive or sensory impairment, or not being comfortable with new technology)

Target Group

- This policy applies to all colleagues within DOVISTA UK.
- It also extends to third parties, outsourcers, joint ventures and partnerships. We ensure that any third parties we engage with are aware of our Vulnerable Customer Policy and are committed to treating customers fairly.

Purpose & Policy

The purpose of this policy is to set out the minimum requirements for colleagues, business units, and relevant third parties to identify and appropriately support vulnerable customers.

The standards outlined in this policy are designed to help us manage risk and prevent potential harm to customers. This aligns with the FCA's Consumer Duty (Principle 12), our regulatory duty to treat customers fairly and our legal obligation to make reasonable adjustments for disabled customers under the Equality Act 2010.

Identifying Vulnerable Consumers

To ensure DOVISTA UK staff can appropriately support vulnerable customers, it is essential to first identify them.

Vulnerability may be indicated through various risk factors such as illness, disability, bereavement, illiteracy, or other impairments. These indicators may be disclosed directly by the customer in correspondence or may become apparent during interactions, such as phone calls or meetings.

Key signs that may suggest a customer is vulnerable include:

- Communication clarity** – Does the customer ask you to speak more slowly or loudly? Do they request clarification or express difficulty understanding terminology? Are you confident they have fully understood the relevant information?
- Cognitive engagement** - Does the customer remain focused and coherent during the conversation; do they appear confused or distracted? Are their responses relevant and appropriate to the discussion?
- Processing time** - Does the customer take an unusually long time to respond, indicating potential difficulty in processing the information?

- d) **Verbal and auditory cues** - Does the customer show signs of disability or impairment through their speech, breathing, hearing or comprehension? Are they fluent and coherent in the language being used?

Staff should remain observant and sensitive to these indicators to ensure vulnerable customers receive the appropriate support and adjustments.

Mitigation Plans

Ongoing evaluation of the vulnerability strategy is critical. It is important that frontline staff receive adequate training to engage in meaningful conversations and know where to access internal expertise when needed.

Flexibility in applying the terms and conditions of financial products and services is key to meeting the needs of consumers in vulnerable circumstances. An effective referral process to specialist teams, empowered to make discretionary decisions, is also vital.

Choice of ways of communicating

When engaging with vulnerable consumers, staff must adhere to the following principles to ensure respectful, effective, and supportive communication:

- a) **Be patient and empathetic** – Avoid rushing the customer, interrupting, or showing signs of impatience. Give them the time and space to process information and make decisions at their own pace.
- b) **Ensure clarity and understanding** – Confirm that the customer can hear and comprehend what is being discussed. Encourage them to explain their understanding or ask clarifying questions throughout the conversation to ensure key points are clear.
- c) **Listen actively and attentively** - Allow the customer to fully express their needs without assumptions. Avoid finishing their sentences, which may suggest you are hurrying the conversation. Pay close attention to any signs of confusion, lack of understanding, or forgetfulness.
- d) **Adapt communication methods** – Check that the customer is comfortable with the format and style of communication. Offer alternative formats (e.g., written correspondence via post or email) if needed. Before acting on any decisions, ask whether they would like to consult someone else.

When a customer is identified as vulnerable, a respectful and appropriately detailed note should be added to their record, with the customer's knowledge and consent where practicable. Vulnerability data, including health information, constitutes special category data under UK GDPR Article 9 and must be processed in accordance with our data protection policies. Access to vulnerability records should be limited to staff directly involved in serving the customer. This ensures that all staff interacting with the customer are aware of their needs and can maintain a consistent level of care and support, while protecting the customer's privacy.

Product Literature and Customer Disclosure

While there are practical limits to what we can reasonably do to determine whether a customer may have a capacity limitation, it is considered good practice to invite voluntary disclosure. Product literature provided to customers prior to offering a product or service should include an invitation for them to share any health or well-being concerns that may be relevant to their decision-making. This invitation should clearly state that any information provided will be used solely to ensure the service is tailored appropriately to their needs.

If a customer discloses information suggesting they may have a mental capacity limitation that could affect their ability to make an informed decision, staff must apply principles of the Mental Capacity Act 2005: capacity should be presumed unless there is evidence to the contrary, and all practicable steps should be taken to help the customer make their own decision before concluding they lack capacity. A disclosure should not result in automatic exclusion from accessing the product or service. Instead, it should prompt us to consider reasonable adjustments to our standard processes to ensure the customer is treated fairly and receives a positive outcome.

Training and feedback

Our approach to supporting vulnerable customers is underpinned by comprehensive training, including sessions delivered by specialist external providers and regular signposting to support agencies. We focus on building awareness of different types of vulnerability and the challenges people may face, including training on recognising warning signs and knowing when and how to refer customers to specialist support. Staff are incentivised to identify and respond effectively to vulnerability, with performance assessments incorporating this responsibility. Managers routinely review a sample of customer interactions, such as telephone calls, emails and complaint correspondence, to evaluate how potentially vulnerable individuals are handled.

We avoid rigid scripts, allowing staff the flexibility to adapt conversations when they sense a customer may be struggling. We also acknowledge that discussing sensitive topics, such as mental health or distress, can be challenging. To help staff feel confident in these situations, we provide clear guidance, role-play exercises, and access to sample calls. This helps remove fear and enable more open, supportive conversations.

Monitoring and Governance

DOVISTA UK is committed to monitoring the outcomes experienced by vulnerable customers to ensure they are as good as those received by other customers. In line with the FCA's Consumer Duty and the findings of the FCA's March 2025 multi-firm review, we will:

- Collect and review management information on vulnerable customer outcomes, including complaint volumes, resolution times, and customer satisfaction among customers identified as vulnerable

- Analyse complaint data to identify systemic issues that may disproportionately affect vulnerable customers
- Report vulnerable customer outcomes to senior leadership on a regular basis as a standing governance item
- Ensure that senior leadership has active oversight of, and accountability for, delivering good outcomes for vulnerable customers

The Complaints Manager, as the named responsible person, will ensure that this policy is reviewed at least annually, or sooner if there are material changes to FCA guidance, legislation, or DOVISTA UK's products and services.

Related Policies

This policy should be read alongside DOVISTA UK's Customer Complaints Policy, which sets out how vulnerability is considered during the complaints process, including reasonable adjustments available to vulnerable customers when making or pursuing a complaint. Staff should also be aware of DOVISTA UK's data protection policies, which govern the handling of sensitive personal data, including vulnerability information recorded on customer files.