

## Vulnerable Customers Policy

*Reference: FG21/1 (parallel application) / Consumer Duty*

This product is sold to companies, not individuals. But the director on the other side of the conversation is a person, and people can be vulnerable. We treat the FCA's guidance for the fair treatment of vulnerable customers (FG21/1) as the floor for how we behave with directors.

### How we recognise vulnerability

The FCA describes four drivers of vulnerability: health, life events, resilience and capability. Any of these can affect a director's ability to engage with us. Specific examples that would prompt us to flag a customer:

- Mental or physical health conditions that affect day-to-day life
- Bereavement, divorce, serious illness in the family
- Sudden loss of income - the company's or the director's
- English not being a first language to a degree that affects comprehension of credit terms
- Cognitive or sensory impairments that affect signing electronic documents

### How we identify it

Mostly by listening. Anyone in our team who picks up a call or reads a message can flag the customer's record. The flag is stored on the customer record (not on the loan), is visible only to staff, and can be added with a note describing what we have heard so the next colleague to speak to the customer is prepared.

### What changes when a customer is flagged

- Top-up borrowing offers are suppressed. We do not proactively offer further credit to a flagged customer; if they ask, a senior manager must approve.
- Marketing emails are paused.
- Default-stage collection actions are paused while we agree a plan; we do not pass flagged accounts to third-party collectors.
- Forbearance requests from flagged customers are prioritised in the staff queue.

### Reviewing the flag

Vulnerability is not necessarily permanent. We review every flagged record annually, and at any point the customer asks. The record carries a note from the staff member who set the flag and a timestamp; staff who change or remove a flag are recorded too.

### Training

Everyone on the team completes vulnerability awareness training at induction and refreshes it annually. The training emphasises practical things - listening for signals, asking open questions, knowing when to escalate.