Vulnerability

Supporting Our Clients

Our approach to vulnerability and how we can help

This document explains what vulnerability means, how you can tell us about your circumstances, and the steps we can take to support you.

What do we mean by vulnerability?

Vulnerability is not a fixed label. It can affect anyone at any stage of life, and it can be temporary, recurring, or long-term. The FCA defines a vulnerable customer as someone who, due to their personal circumstances, is at greater risk of harm, particularly if a firm does not take reasonable care.

At our firm, we take this seriously. We want to make sure that anyone who interacts with us receives fair treatment and, where needed, appropriate adjustments to the way we communicate and work with them.

What are the main drivers of vulnerability?

The FCA identifies four broad categories that can make someone more vulnerable. These are not exhaustive, and you do not need to fit neatly into any one of them to ask for support.

Health

- Physical illness or disability affecting your day-to-day life
- Mental health conditions such as anxiety, depression, or other diagnosed conditions
- Cognitive conditions including memory difficulties, dementia, or learning disabilities

Life Events

- Bereavement or caring for someone who is seriously ill
- Relationship breakdown, including divorce or separation
- Job loss or a significant and unexpected change to your income

Resilience

- Low ability to withstand financial or emotional shocks
- Over-indebtedness or using money you cannot afford to lose
- Low emotional resilience that affects your decision-making
- Trading compulsively or in ways that feel out of control

Capability

- Limited knowledge or experience of financial products
- Low confidence in managing money or making financial decisions
- Difficulty with literacy, numeracy, or digital communication

You may recognise some of these in yourself right now, or you may have done in the past. Circumstances change, and so can your need for support.

If you are in immediate distress

If you are experiencing thoughts of suicide or self-harm, please contact the Samaritans immediately on 116 123 (free, 24 hours a day, 7 days a week). You can also text SHOUT to 85258. Please do not wait to reach out to us first.

We understand that financial stress can have a serious impact on mental health. If you are struggling, speaking to someone is the most important step you can take.

How do we identify vulnerability?

We recognise that vulnerability is not always easy to disclose. Many people are unaware that they may be experiencing it, and it can change over time in ways that are difficult to notice.

For this reason, we do not rely solely on clients telling us. Our team monitors for changes in trading behaviour and patterns that may indicate a client is under stress or acting out of character. If we have concerns, we may reach out to you directly, not to judge, but to check in and offer support.

You will never be penalised or treated differently in a negative way for disclosing vulnerability or asking for help.

How can you tell us?

If you think any of the above applies to you, or if something in your life has changed and you are not sure what to do, please get in touch as soon as you feel able to.

You can contact us by:

- Email: uk@cfi.trade clearly marked **"Vulnerability – Confidential"**
- Telephone: 0203 – 907 – 4131 ask to speak with the Compliance team

Anything you share with us about your circumstances will be treated in strict confidence and handled sensitively. We will acknowledge your contact within one business day.

What adjustments can we make?

Depending on your circumstances, we may be able to:

- Adjust how and when we communicate with you (for example, preferring written communication over calls, or simplifying language)
- Give you extra time to make decisions without pressure
- Temporarily suspend trading on your account at your request, with the ability to lift the suspension when you are ready
- Close your account if that is what you need, and guide you through the process
- Signpost you to independent support services

We will always discuss the options with you and agree a way forward that suits your situation. We will not make decisions on your behalf without your input.

If you have previously requested a suspension and you feel ready to resume trading, please contact us and we will discuss whether it is appropriate to do so.

Where can you find independent help?

We encourage you to seek support from specialist services if you need it. Below are some organisations that may be able to help.

Mental Health

Samaritans (crisis support, 24/7): www.samaritans.org | Call: 116 123
Mind: www.mind.org.uk
Rethink Mental Illness: www.rethink.org

Debt and Financial Difficulty

MoneyHelper (free government-backed service): www.moneyhelper.org.uk
Payplan: www.payplan.com
Debt Advice Foundation: www.debtadvicefoundation.org

General Advice

Citizens Advice: www.citizensadvice.org.uk

Your right to complain

If you feel that we have not handled your situation appropriately, or that you have not received the support you were entitled to, you have the right to make a complaint.

You can complain to us directly, we will acknowledge your complaint within five business days and provide a full response within eight weeks. If you remain dissatisfied, you can refer your complaint to the Financial Ombudsman Service (FOS) free of charge.

Financial Ombudsman Service: www.financial-ombudsman.org.uk | Call: 0800 023 4567

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