

How Fundamental supports vulnerable clients

This document explains how Fundamental Asset Management provides extra support to clients (and prospective clients) who might need it. We acknowledge vulnerability can take many forms and is specific to each individual.

BUSINESS MODEL & TARGET MARKET

Fundamental Asset Management Ltd is a specialist investment manager with a focus on direct equity investment.

The firm's primary investment management service focuses on the mitigation of future Inheritance Tax, through investment in the shares of Business Relief qualifying AIM companies. AIM is the growth market of the London Stock Exchange.

The firm's clients are predominantly elderly and have sizeable estates, well in excess of Inheritance Tax thresholds, and significant net liquid assets.

The firm also manages a small number of general portfolios for private clients, limited companies and trusts.

Clients come directly or are introduced to the firm via FCA regulated financial advisers. A large proportion of client portfolios are managed on Adviser 'wrap' platforms, operated via a tripartite arrangement between our firm, the adviser and the platform.

WHEN EXTRA SUPPORT COULD HELP

Our regulator, the Financial Conduct Authority (FCA), defines a vulnerable client as 'Someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care'. Some of these circumstances include:

- **Health** – conditions or illnesses that affect the ability to carry out daily tasks such as physical disability, severe or long-term illness, hearing or visual impairments, poor mental health, addiction, and low mental capacity or cognitive disabilities.
- **Major life events** – including caring responsibilities, bereavement, income shock, relationship breakdown, domestic abuse, and retirement.
- **Resilience** – low ability to withstand financial or emotional shocks.
- **Capability** – poor communication skills (perhaps because of health e.g. poor hearing), and no or low access to help and support.

Our clients are experienced investors, but may suffer from one or more these vulnerabilities at any point. This doesn't necessarily mean they need extra support.

Our staff are trained to identify signs that someone might be especially susceptible to harm and extra support could be helpful. If you believe you could benefit from extra support, please let us know.

HOW WE PROVIDE SUPPORT

Our product offering – We consider the features of each investment product we make available alongside the needs of potentially vulnerable clients in our target market to ensure they will not be adversely affected.

Our written material (online and offline) – We ensure each communication is clear, to the point and free of jargon. We also consider characteristics of vulnerability and adapt our communications as necessary.

Our direct communications (by email and phone) – We ensure each communication is clear, to the point and free of jargon. We also consider characteristics of vulnerability and adapt our communications as necessary. We speak clearly and provide full explanations, with patience and empathy where necessary. We stay focused on the topic, avoid making assumptions, and look to offer clarifications where necessary. We provide clients with the time and information they need to make their own investment decisions and do not place them under time pressure. We are alert to signs of potential vulnerability, e.g. hallmarks of difficulties understanding, physical disabilities (such as limited vision), and possible signs of duress.

This is not an exhaustive list and is used as guidance only. We treat all clients as individuals and endeavour to help them achieve a good and fair customer outcome. This could include structuring conversations to support and check understanding, offering information in alternative formats, e.g. large print, or encouraging the client to read any documentation with a family member. We also deal with any third parties a client authorises to deal with in a helpful and transparent manner.

HOW TO TELL US IF YOU NEED SUPPORT

We understand that everyone has different needs, and some may require additional assistance. If you think we could help by providing additional support, please let us know. You can contact us through the details on our website.

Please be aware that we may need to collect limited additional information to provide you with the necessary support. We would not normally record any details of the vulnerability itself. This may include the interventions or adjustments you have requested, e.g. documents in large print, to ensure we are aware of your needs when we are dealing with you.

HOW TO CONTACT US

If you have received advice please ask your financial adviser if there's anything you don't understand.

You can also contact us directly at:

Fundamental Asset Management Ltd

Cardinal Point

Park Road

Rickmansworth

WD3 1RE

Telephone: 01923 713890

Email: enquiries@fundamentalasset.com

HOW TO COMPLAIN

Complaints should be addressed to The Compliance Officer, Fundamental Asset Management Ltd, at the address given above.

IMPORTANT INFORMATION

Issued by Fundamental Asset Management Limited. Fundamental Asset Management Ltd is Authorised and Regulated by the Financial Conduct Authority. This is not an offer to sell or a solicitation of an offer to purchase shares. You should not invest in our AIM IHT portfolio service unless you have read our Terms and Conditions, are aware of the risks involved, are prepared to hold for the long term and can risk making a loss. Smaller quoted companies can be subject to certain specific risks not associated with larger, more mature companies. The information and opinions contained in this document are for background purposes only and do not purport to be full or complete. Past performance is not necessarily a guide to future performance as the price of shares can fall as well as rise and you may not get back all the money you invested. The extent of the tax benefits available will depend on the qualifying conditions and investors should seek professional advice before investing. No reliance may be placed for any purpose on the information or opinions contained in this document of their accuracy or completeness. If you have any doubt whether this product is suitable for you and you wish to obtain personal advice, please contact an Independent Financial Adviser.