

# Vulnerable Client Statement

## EFG Private Bank Ltd.

*EFG Private Bank Limited and its UK regulated entities (“EFGIUK”) are authorised by the Prudential Regulation Authority and regulated by the Prudential Regulation Authority and Financial Conduct Authority (collectively, “the regulators”). EFGIUK aims to provide clients with the highest standards of service in International Private Banking and Wealth Management.*

### Vulnerable Clients

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.***

The FCA expects firms such as EFG Private Bank Limited to treat all our clients fairly and when dealing with people with vulnerable characteristics or circumstances to take these into account to ensure that the way we sell and provide our services does not cause them detriment.

Protecting vulnerable clients is a key priority for EFG Private Bank Limited. Our staff are trained to identify vulnerable clients and to provide the additional level of assistance they may require in order to achieve a good outcome. However, it is not always easy to recognise the characteristics of vulnerable client characteristics on all occasions. Therefore, if you believe you are a vulnerable client, please read this statement and notify us as soon as possible of your particular needs. You are encouraged to do this when you first contact us.

Vulnerable clients may have different needs or require additional measures to ensure good outcomes compared to other clients. As an example, cognitive impairments or mental health problems can lead to the wrong financial decision being made by a client.

Vulnerability can be permanent or transient because clients’ circumstances constantly change. Some clients will be more susceptible to poor outcomes due to certain characteristics.

### Drivers of increased client vulnerability

Driver	Description
Health	Health conditions or illnesses that affect the ability to carry out day-to-day tasks.
Life events	Major life events which increase stress or decision-making ability.
Resilience	Low ability to withstand emotional or financial shocks.
Capability	Reduced levels of knowledge of financial matters or low levels of confidence in managing money. Possible reduced capability in other relevant areas such as literacy or digital skills.

We are mindful that clients may have one or more characteristics of vulnerability and the position can change quickly. For example, a life event such as a relationship breakdown or bereavement may lead to further vulnerability such as mental ill-health or low financial resilience. This can have greater impact if the client also has lower levels of knowledge in relation to financial matters.

A survey by the FCA found that just under half (46%) of UK adults, aged 18 and over (24.1 million people), display one or more characteristics of vulnerability that fall under these four drivers. Some groups are more likely to display characteristics of vulnerability than others, such as those over 75 or those with no experience of investing.

### Examples

There are numerous examples of issues or events that fit within the key-drivers identified by the FCA:

Physical disability	Bereavement	None or low levels of emergency funds	Low levels of financial knowledge
Severe or long-term illness	Retirement	Over indebtedness	Poor literacy or numeracy skills
Hearing impairment	Income shock	Low levels liquid assets	Low English Language skills
Visual impairment	Relationship breakdown	Low emotional resilience	Poor digital/technology skills
Poor mental health	Moving to a new house	Low or erratic income	Learning impairments
Addiction	Caring responsibilities		No/low access to help or support
Low mental capacity	Domestic abuse		Lack of confidence managing finances
Cognitive impairment	Loss of job		
Short term issues, e.g. operations			
Older age			

It is important to us that we are able to identify clients who may be vulnerable under any of these four categories, and we are committed to training all our team to identify any key indicators of vulnerability which may see clients finding themselves with their judgment impaired or receptive to influence or exploitation.

## Communications

It is our duty to ensure we communicate effectively with vulnerable clients in a manner which will enable them to understand the information being provided and make informed decisions.

Low capability or physical impairments can result in specific communication requirements. Literacy difficulties, poor knowledge of financial products and cognitive impairments must be taken into consideration. Sight and hearing impairments can make certain channels of communication difficult and using alternative methods essential.