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# **VULNERABLE CLIENT POLICY**

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**Version 1.0**

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**March 27, 2024**

Legal, Regulatory and Governance Office

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**REVISION HISTORY**

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1.0	03/27/2024	R. Peterson	B. Beck	New policy

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At ASCENDANTFX CAPITAL UK, LIMITED (“Ascendant”) we are committed to providing foreign currency exchange and cross-border payment services on a non-advisory basis with the highest standards of care and integrity. Recognising the importance of our personalised relationships with clients, we have developed this policy to ensure fair treatment, value, and support for clients with characteristics of vulnerability.

## 1. PURPOSE

This policy is designed to ensure that Ascendant:

- Meets the unique needs of clients with characteristics of vulnerability.
- Provides fair value in all our services.
- Avoids causing foreseeable harm to clients.
- Supports clients in achieving their financial objectives.

## 2. DEFINITION OF VULNERABILITY

We understand that vulnerability can manifest in various forms, including physical or mental health challenges, financial difficulties, or life-changing events. Our policy is inclusive and considers individual circumstances.

## 3. FAIR VALUE

Ascendant is committed to delivering non-advisory services that represent fair value for all clients. We ensure that fees, charges, and exchange rates are transparent and competitive, providing clients with confidence in their financial transactions. Ascendant designates an Account Manager to each client, ensuring a personal relationship that enables us to identify our vulnerable clients’ unique requirements and offer them the best solutions from our product range.

## 4. AVOIDING FORESEEABLE HARM

We prioritise a culture of recognising and mitigating potential risks to our clients. We encourage proactive identification and resolution of issues to safeguard the interests of vulnerable clients.

## 5. SUPPORT IN ACHIEVING FINANCIAL OBJECTIVES

Our personalised approach means that we will work closely with vulnerable clients, taking their unique circumstances into account and providing additional support where necessary.

## 6. PROPORTIONAL AND REFLECTIVE APPROACH

Our Vulnerable Client Policy is proportionate to the personalised nature of our client relationships. It reflects the context of our services, ensuring that the support we offer aligns with the individual needs of vulnerable clients.

## 7. TRAINING AND AWARENESS

At Ascendant, we ensure our team members are trained to spot signs of vulnerability and respond accordingly. Even though our business does not deal with vulnerable customers in the retail context, we still pay attention to clients who may lack resources or expertise in certain financial areas. This means being aware of the realities of small-scale operations or lack of specialised knowledge. We promote a culture of awareness and sensitivity to make sure all clients are treated with respect and understanding, no matter their situation.

## 8. CONTINUOUS REVIEW

We commit to regularly reviewing and updating this policy to adapt to changing circumstances, regulations, and client needs. Continuous improvement is integral to our commitment to providing the highest standards of service.

[Add a contact us heading]

If you have any questions, comment or concerns about Ascendant and its commitment to vulnerable clients, please contact:

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