



# Vulnerable Customer Policy

## Purpose

WireBarley understands that anyone can be vulnerable at any stage of life, under a variety of circumstances. We are here to assist customers whose ability or circumstances require us to take extra precautions in the way that may require more help from us than our standard service. The Vulnerable Customer Policy is designed to ensure that we conduct our business in a way that does not have a disadvantageous impact upon vulnerable customers. We want to make sure that our customers with vulnerabilities are treated fairly, based on their individual circumstances. This policy is relevant to all WireBarley customers and all potential customers who are connected with WireBarley.

## Definition

The Financial Conduct Authority (FCA) defines a vulnerable customer as “someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.”

The FCA expects us to treat all our customers fairly especially when dealing with people with vulnerable circumstances to ensure that the way that we provide our services does not cause them to receive inferior service for being less capable of making the best decision for themselves or be put at detriment from taking up our services

Examples of vulnerabilities:

Language Barriers

Hearing Difficulties

Mental Health Issues

Bereavement

Financial Hardship

Illness and Physical Disabilities

Age 65 and over

## Identifying a Vulnerable Customer

Our staff are periodically trained on identifying vulnerable customers who needs additional level of assistance to be fairly served. Just by communicating with customers, it sometimes maybe difficult to decide if additional care is needed. We encourage vulnerable customers to notify us as soon as possible regarding your needs.

Regardless of being a Vulnerable Customer or not, we do not accept applications for clients who are under 18 years old.

## Engaging with a Vulnerable Customer

When we detect the need for extra care, we immediately make a record of each case and provide information to ensure we adhere by the Vulnerable Customer Policy. Also, several opportunities will be given to confirm you understood the information we have provided. We will ask if there is anybody who is able to assist on your behalf. If we believe that you are at a disadvantage due to the vulnerabilities, we will make arrangements to complete the transaction later times with assistance and provide alternative options that are available. Anyone who is identified as a Vulnerable Customer that is over 70 years old is required to send over a selfie holding a valid government issued ID.

## Policy statement

WireBarley believes in the utmost importance in building relationships with our customers and circumstances. Any services provided by WireBarley will be presented in a way that is fair to each customer. We will carefully plan how to deal with a vulnerable customer to make sure that they are not disadvantaged. The vulnerability cases will not be shared outside WireBarley and will not be a permanent record.

To register as a vulnerable customer, customers can direct their information to:

*In Person:* Paul Kim

*Phone:* 703-712-7078

*Email:* [paul.kim@wirebarley.com](mailto:paul.kim@wirebarley.com)

*In Writing:* WireBarley America Inc.

*Attn:* Paul Kim

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