

## Vulnerable Customer Policy

### 1. Introduction

All human beings are not alike and some need special care and attention due to myriad of reasons, including but not limited to, physical and mental impairment, stress, health, sight, hearing, understanding, debt, trauma, old age, dementia, financial instability, dependence. Care and caution should be followed while dealing with them.

### 2. Purpose

This policy is followed to ensure that any and all of our existing or prospect customers are treated with care while communicating, either in writing or verbally.

### 3. Scope

This policy is to be adhered to and by all the staff, vendors and third parties working with Opton Teleco Ltd and customers.

### 4. Definition

"A vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care." - Definition of Vulnerability (FCA OP8)

### 5. Objectives

This policy ensures that the vulnerable people are not taken advantage of in any form. They should be aware of the communication without any confusion. They should be able to take a well informed decision or direct the representatives to speak to someone who is responsible for the well being of the concerned person. Clarity on what is possible from our end as a company is emphasised to eradicate ambiguity in expectations.

### 6. Procedures

Several procedures are in place to ensure the adherence to the policy which is mentioned hereunder:

- i) Training: Special emphasis is given during the training on lines of politeness, clarity, identifying vulnerability, courtesy, and other communicational skills.
- ii) Monitoring: The representatives are not allowed to raise their voices, use sarcasm, or be rude. Maintaining a calm approach while dealing with a supposedly irate or anxious customer is paramount. Empathising and offering a possible solution goes a long way in maintaining a happy customer.
- iii) Audit: Calls made to the customers or prospects or calls received are regularly audited to identify any possible lapse. Any new scenario is also accounted for and included in the subsequent trainings.
- iv) In any of the audits if a lack of identification or appropriate behaviour is noticed, the customer is called and the mistake is corrected or explained. If the case is of mis-information or misleading, intentionally or unintentionally, the customer has the right to cancel or alter the services.
- v) Penalties: Depending upon the nature of instance, the representative is suitably rewarded or penalised.

## 7. Assessment

Assessing a vulnerable customer starts from the initial contact and at each subsequent instance we observe for any or more of the following identifiers:

- i) Difficulty in hearing
- ii) Difficulty in understanding
- iii) Asking irrelevant questions
- iv) Not paying attention
- v) Feeling irritated
- vi) Apparent or ostensible clues, such as sighs, difficulty talking, distress, and other verbal clues.
- vii) Anxious about financial commitments.
- viii) Unable to decide and need prompting.

Using the above identifiers along with questions to verify the vulnerability, the customer is treated accordingly.

## 8. Implementation

Assessment is an ongoing process and based upon the possibility of vulnerability, representatives, communicate in precise and clear language without using jargons. The customer is explained the possible outcomes of the decision they make from the available products. If there are any questions or doubts they are explained again. Any question asked by the customer has to be answered as accurately as possible. During the initial contact it is specifically asked if the customer's affairs are managed by someone else and if the person is mentally sound to take decisions regarding our services. A letter mentioning clearly of services are altered, cancelled or added, is sent to the customer and our support staff contacts them to verify if they received the paperwork and are satisfied with the offer.

## 9. Training and Support

The audits which take place during the history of the customer being with Opton Teleco Ltd, provide the basis of our training. Any unexpected situation is immediately identified and all the staff is trained on ways to deal with a similar situation.