CONSUMER DUTY POLICY

The Consumer Duty Rules set out the standard of care that firms should give to customers in retail financial markets. Heritage has adopted and complies with these Consumer Duty Rules which puts the needs of clients first. Delivering good outcomes for clients is at the heart of our business strategies and objectives.

Heritage will:

- Put clients at the core of our business and focus on delivering good outcomes for clients
- Provide products and services that are designed to meet clients' needs, that clients know provide fair value, that help clients achieve their financial objectives and which do not cause them harm
- Communicate and engage with clients so that they can make effective, timely and properly informed decisions about financial products and services and can take responsibility for their actions and decisions
- Not seek to exploit clients' behavioural biases, lack of knowledge or characteristics of vulnerability
- Support our clients in realising the benefits of our the products and services and act in their interests without unreasonable barriers
- Consistently consider the needs of our clients, and how they behave, at every stage of the product and service lifecycle
- Continuously learn from our growing focus and awareness of real client outcomes
- Ensure that the interests of our clients are central to our culture and purpose and embedded throughout our organisation
- Monitor and regularly review the outcomes that our clients are experiencing in practice and take action to address any risks to good client outcomes
- Ensure that our board of directors takes full responsibility for ensuring that the Consumer Duty Rules are properly embedded within the firm and are accountable for the outcomes our clients are experiencing.

This means that we will ensure:

- Our investment products and services meet your needs
- That the price and value outcomes of our products and services meet your needs
- That you understand our products and services
- That we provide ongoing support for you, and
- That we identify any vulnerable clients who might suffer harm by investing with us and treat them fairly.

We will always:

- Act in good faith towards all our retail clients
- Avoid causing foreseeable harm to you, and
- Enable and support you to meet your investment objectives.

We will also ensure that key information is clear, visible and accessible, and our website will be the main source of all general information.

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