

ETFS CONSUMER DUTY STATEMENT



STATEMENT

At ETFS, we have always tried to put the customer's best interests at the heart of everything we do, and to ensure that the customer experiences a positive outcome.

We therefore welcome the FCA's Consumer Duty obligations to "act to deliver good outcomes for customers". Our primary objective is to ensure that we put your interests first.

At ETFS we believe that culture drives behaviour and behaviour drives culture. We seek to promote good behaviour by all our employees, across all aspects of our organisation and to develop a culture in which it is clear that there is no room for misconduct. This would include consideration of behaviours when using social media sites and staff conduct outside of the workplace.

In addition to the behaviours of our employees, we also expect the behaviours of those acting on our behalf e.g. outsourced service providers to meet and reflect these behaviours and uphold our standards.

In embracing the Consumer Duty, ETFS is aiming to:

- Protect the interests of its customers at each stage of the product cycle
- Be as open as possible, and ensure that customers understand that we have put "all of our cards on the table"
- Ensure that customers feel that they have all the information and support that they need at each stage of their dealings with us. We want customers to believe that using ETFS products and services will allow them to achieve their financial objectives.
- Maintain appropriate records to enable ETFS to demonstrate that it has met its obligations.

CONSUMER OUTCOMES

ETFS know that every customer:

- Has different needs
- Has different levels of understanding of the products and services we provide
- Will want information delivered to them in a way that they can understand and use.
- Will want our products and services to deliver what the customer should reasonably expect.

ETFS will ensure that, where appropriate, these outcomes are achieved and are fundamental to all parts of the company's business.

When considering the FCA Consumer Duty, there are a number of guiding principles for firms to focus upon and ETFS' employees must take these into account wherever appropriate:

Product Design – it is essential that Products and services are designed to meet the needs of identified customers. Furthermore, the products should be targeted at these predefined customers. As part of our decision-making process, we ensure that the product or service actually suits the customer base we are designing it for and, just as importantly, remains that way. We test this with real customers information as far as possible.

Identifying target markets and selection of distribution channel - the target market will be identified before undertaking product design. The main distribution channels will be selected beforehand as part of



the business strategy, though any selection of an additional channel will be subjected to a detailed assessment of the likely customer outcomes.

Marketing and promoting the products, including provision of information to distributors - ETFS shall communicate with the customers as well as the distributors in a way that is clear, fair and not misleading. The Company will adhere to this principle by way of actively communicating and engaging with the distributors and customers on a regular basis with a view to ensuring the product features and the processes involved are clearly understood by them.

Pricing and Value for Money – A crucial part of the design of the products and services we provide is ensuring that customers get value for money from them. We ensure that our products and services are priced sensibly and in a way that allows us to maintain those prices long term. We also ensure that any savings we make from economies of scale, etc are shared with customers. We continuously re-test throughout the life cycle of our products and services. assess the value we offer and

Remuneration – although ETFS employees are not commission or bonus driven; ETFS does have a discretionary bonus scheme. ETFS has a responsibility to ensure that employees are considering the likely customer outcomes at all times and that any discretionary bonus payments that may be paid are consistent with the FCA Consumer Duty.

Complaint Handling – ETFS has rigorous procedures to ensure that any complaint is handled in a consistent, prompt and fair manner. All contact details are made available to customers and a free phone number is available on our website.

Outsourced Activities – the FCA has provided detailed guidance where a firm outsources certain activities. ETFS responsibility and risk for the activity are not outsourced and a full regulatory and operational due diligence process of the outsourcing both at commencement and throughout the relationship is in place.

Management Information - ETFS includes management information into its day to day running of the business. This is also accomplished by regular review of key performance indicators and root cause / trend analysis. We also ensure that any distributors of ETFS products and services provide us with the information we need to monitor their activities.

Training – Employees receive regular training across all of our business to ensure the information they provide is clear and appropriate before, during and throughout their employment.

ETFS takes its responsibilities as a product provider very seriously and has made every effort to ensure that we provide good customer outcomes at every stage of our relationship. We remain fully committed to the fair treatment of customers and closely monitor our standards on an on-going basis.

ETFS is authorised and regulated by the Financial Conduct Authority and is entered on the register under reference 227807. The FCA's address is 12 Endeavour Square, London, E20 1JN. Registered in England number 04856420. Registered office: 4th floor Pountney Hill House 6 Laurence Pountney Hill EC4R 0BL

