



Our Duty

As an FCA regulated firm we have a duty to act to deliver good outcomes for retail customers.

In practice, Our Duty centres on four outcomes:

1. Products and services
2. Price and value
3. Consumer understanding
4. Consumer support

Cross-cutting rules

The FCA has set out an overarching set of cross-cutting rules to help drive the right outcomes:

1. Act in good faith
2. Avoid foreseeable harm.
3. Enable and support retail customers to pursue their financial objectives.

How we approach this

Target Market

The overall target market for Rowan Dartington is summarised in our [Target Market documents](#), which provide details of the approach to defining the target market for all Rowan Dartington manufactured propositions and models.

Our Target Market documents cover the following points:

- ◆ Who is it suitable for?
- ◆ What is the Distribution Strategy?
- ◆ Vulnerable Client Policy
- ◆ What is the risk profile of the product?
- ◆ Client objectives
- ◆ Who is the product not suitable for (Negative Target Market)?
- ◆ Does this provide fair value?

Fair Value Statement

Rowan Dartington has undertaken a fair value assessment of its Propositions and Models in line with regulatory expectations under the Consumer Duty and considers that the benefits of the services represent fair value relative to the costs of the services.

Distribution Strategy

Rowan Dartington Investment Managers and St. James's Place Partners follow an Advice Framework (the 'Framework') when determining the recommendations they make this ensures suitability, taking into account the client's needs, characteristics, and objectives.

Vulnerable Clients

Rowan Dartington have a comprehensive policy for clients in vulnerable situations. This policy follows the FCA's four key drivers which may increase the risk of vulnerability; these are:

- ◆ health, such as poor mental or physical health
- ◆ low financial or emotional resilience
- ◆ life events such as bereavement or divorce
- ◆ low capability, including poor digital, language and cognitive skills, as well as low financial capability.



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