Quilter

Platform due diligence made easy

This document gives you instant access to the due diligence questions we're frequently asked by UK financial advisers, laid out in an easy question and answer format.

Two ways to use this document:

- ✓ Either save it for your records in its current form;
- ✓ Or copy and paste the relevant questions into your own reports.

Topics covered

We cover all of the FCA's nine areas of focus for assessing platform suitability:

1. The platform provider
2. Product range
3. Charges
4. Fund range and asset classes
5. Support services
6. Functionality
7. Accessibility
8. Additional tools
9. Terms and conditions
10. Summary

Suitable for financial advice professionals only

Where we use the term 'platform' in this document, this means Quilter's technology platform, which hosts collective investments and ISAs as well as bonds and pension products. The platform also provides access to the CashHub, powered by Bondsmith. The FCA's platform rules do not apply to the bond and pension products, or the CashHub.

Introducing Quilter's platform

We're committed to continually reinvesting in our platform and proposition to make improvements for our users. We listened to adviser feedback to create a platform that's quicker, easier and smarter for you to use.

With it, we delivered some major enhancements that give you:

- ✓ Wider choice
- ✓ Greater convenience
- ✓ More control

To give you a quick overview of the enhancements we made to our platform technology, below are some of the most important features.

Products	
Collective Retirement Account	✓
Junior Collective Retirement Account	✓
ISA	✓
Junior ISA	✓
Collective Investment Account	✓
Collective Investment Bond	✓
CashHub (savings accounts)	✓

Investments	
Access to exchange traded funds	✓
Access to investment trusts	✓
Access to cash	✓
Hold multiple investment strategies in the same tax wrapper	✓
Pension – separate management of accumulation and decumulation assets	✓
Access to discretionary investment managers	✓
Adviser model portfolio management	✓

Adviser and client reporting	
Client reporting tool – money weighted client reporting	✓
Produce ad hoc statements, contribution statements and historic valuations	✓
Comprehensive business and adviser MI	✓

Functionality	
Online withdrawals up to £75,000	✓
Flexi ISA capability	✓
Online income management	✓
Quick quote functionality	✓
Flexible withdrawal dates (1st – 28th) *where available	✓
Flexible Direct Debit collection dates (1st – 28th) *where available	✓
Manage regular investments online	✓
Specify assets for withdrawals and pension crystallisation	✓
Performance tracking	✓
Family linking	✓
Re-envelope PCLS into other wrappers on platform	✓

Online services for customers	
Performance tracking	✓
Online withdrawals for ISA/CIA up to £75,000	✓
Amend regular investments	✓
Amend regular withdrawals	✓
Access via the web and customer mobile app	✓

Ease of use	
Online user experience	✓
Cross browser functionality	✓
Mobile and tablet optimised	✓
Acceptance of digital signatures	✓

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Section 1

The platform provider

Q *1.1 Who is Quilter?*

A We are part of Quilter plc, a leading UK-focused wealth manager, providing advice-led investment solutions and investment platform services.

Quilter enables financial advisers to deliver the very best service to clients and their families, to help them achieve their financial goals. We offer a comprehensive range of products and investments through our award-winning online investment platform, which is known for its intuitive user experience that makes online processes quick and easy.

Our products and services are designed to support any adviser business model, and we are always evolving them to meet the changing needs of advisers and customers.

Q *1.2 Provide a brief history of your company.*

A

1984 – Pioneers multi-manager investing in the UK (the UK's first platform offering).

1993 – Launches the UK's first fund supermarket, Skandia Life PEP Managers Limited, later to become Skandia MultiFUNDS Limited.

1995 – Launches the online platform, SkandiaWrap, later to become SkandiaView.

2006 – Brings Selestia Investment Solutions platform into the Skandia proposition.

2009 – Selestia Investment Solutions changes to Skandia Investment Solutions (SIS) and migration of clients from SMFL completes. SIS was the trading name for the platform business Skandia MultiFUNDS Ltd (SMFL) and the life company, Skandia MultiFUNDS Assurance Limited (SMAL).

2014 – Skandia UK rebrands as Old Mutual Wealth and buys the Intrinsic financial advice network.

2014 – Launches WealthSelect, one of the first managed portfolio services to offer advisers access to a range of actively managed, risk-targeted multi-asset portfolios.

2015 – Old Mutual Wealth buys Quilter Cheviot Discretionary Asset Management.

2016 – Old Mutual plc announces a 'Managed Separation' strategy, which aims to separate its underlying businesses, including the Old Mutual Wealth Group.

2017 – Announcement of Quilter as the new name for the Old Mutual Wealth Group.

2018 – Quilter plc lists independently on the London and Johannesburg stock exchanges and later confirms the rebrand of the multi-asset investment business to Quilter Investors.

2019 – Quilter confirms the successful rebrand of Intrinsic to Quilter Financial Planning and completes the sale of its heritage life assurance business to ReAssure.

2020 – Quilter confirms the successful rebrand of its international business, which becomes Quilter International.

2021 – Old Mutual Wealth's UK Platform successfully completes its move to new technology, supplier, FNZ and rebrands as Quilter.

2021 – Quilter completes the sale of Quilter International to Utmost Group.

2022 – Significantly expands range of successful WealthSelect managed portfolios, with full spectrum of portfolios to cover clients' risk, investment preferences with an ESG overlay.

2023 – Quilter introduced additional adviser model 'Quilter Partners' – delivering a franchise-style model where adviser firms operate under a co-branded arrangement

2024 – Quilter fully launches platform-integrated savings marketplace, the CashHub. Quilter plc completes the acquisition of NuWealth.

2025 – Quilter Cheviot Financial Planning becomes Quilter Cheviot. NuWealth becomes Quilter Invest.

Q *1.3 What are your company and regulatory registration numbers?*

A

Company Name	Company Number	VAT Number	Financial Services Number
Quilter Investment Platform Limited provider of CIA, ISA and JISA and distributor of the CashHub	1680071	386 1301 59	165359
Quilter Life & Pensions Limited (Pension and bond)	4163431	386 1301 59	207977

Q *1.4 Who is your parent company?*

A Quilter plc is a leading wealth management business in the UK, helping to create prosperity for the generations of today and tomorrow. Quilter plc oversees £157.4bn in customer investments (as at 30 June 2026).

It has an adviser and customer offering spanning: financial advice, investment platforms, multi-asset investment solutions, and discretionary fund management.

The business is comprised of two segments: Affluent and High Net Worth.

Affluent encompasses the financial planning businesses under Quilter Financial Planning, Quilter's platform and Quilter Investors, the multi-asset investment solutions business.

High Net Worth includes the discretionary fund management business, Quilter Cheviot, together with Quilter Cheviot Financial Planning.

Q *1.5 How would you describe your platform?*

A Quilter's platform has been developed to provide advisers with wider choice, greater convenience and more control. Being user-friendly is in our DNA and we strive to make advisers' activities quicker, easier, and harness technology to make things smarter. Quilter's platform has the strength and capability to support client needs both today and into the future. It does this by giving you:

- Intelligent options for investment management
- Online processes saving you time and money
- Data-rich, time-saving reports
- Even more flexibility from a market-leading pension
- Straightforward cash management
- Flexible model portfolios you can easily control
- Seamless access to discretionary services.

This is underpinned by an award-winning service to both advisers and customers, clear and simple charges with extensive family linking, and some of the best fund deals in the market.

Q *1.6 How would you describe your service reputation?*

A Quilter's platform has been consistently recognised as being of very high quality within the financial services industry, which is evident in the awards we have won.

We compare ourselves against other platform providers and the service they provide using adviser sentiment and reports from independent research agencies to form and adapt our proposition, and ensure we continue to meet and exceed the needs and expectations of advisers and their clients.

Q *1.7 What awards have you won?*

A Since 1992, Quilter has won the coveted Financial Adviser 5 Star Service Award 45 times, along with an outstanding achievement award.

In addition we are proud to have won the following recent awards.

Defaqto 2026 Gold Service awards
Platform
Pension
Investment bond

Defaqto 2026 5 Star awards
Platform
Personal Pension
Onshore Bond

Defaqto 2026 Diamond Rating
5 Diamond Rating for WealthSelect Managed Active Portfolios
5 Diamond Rating for WealthSelect Managed Blend Portfolios

FE AdviserAsset 2025 Platform Rating
Quilter's platform received a platinum rating for the tenth consecutive time.

Professional Adviser Awards 2025
Best MPS Provider (WealthSelect)

FT Financial Adviser Service Awards 2025
Platform – Five stars
Pension – Five stars
Investment – Five stars

Schroders UK Platform Awards 2025
Platform of the Year
Best Platform Provider (AUM over £40bn)
Leading Platform for Discretionary Investment

ILP Moneyfacts Awards 2025
Best Online Service

Money Marketing Awards 2025
Best Retirement Provider
Best Financial Adviser Academy

Professional Paraplanner Awards 2025
Best Overall Service to Paraplanners – Existing Business

Star Gold Transfers Accreditation 2025
ISA and GIA – Gold
Pensions – Gold

Q *1.8 How many advisers are using your platform?*

A Over 5,000 adviser firms are registered to do business with Quilter, and over 23,000 advice professionals, including advisers, paraplanners and administrators use our online platform.

Q *1.9 How many staff do you employ?*

A Quilter plc has over 3,200 employees; Quilter's platform business has over 700 employees, almost 500 of which are in our operations area.

Q *1.10 How focused are you on helping the advisory market?*

A Quilter aims to play an active role in the financial services industry to promote a long-term savings culture, champion financial advice, provide financial education and help raise the standards of conduct in the financial services industry – to help create prosperity for the generations of today and tomorrow.

Quilter only sells its products to customers that are introduced to us through financial advisers, since we believe that quality financial advice is essential to great client outcomes.

Our platform is focused on helping UK financial advisers build more successful businesses, and we do this in three main ways.

Firstly, our platform has everything a financial adviser needs to deliver an exceptional service to their clients. This includes access to award-winning products, the most competitively priced funds and complete flexibility when it comes to clients taking an income.

Secondly, we make it incredibly easy for an adviser's team to use the platform, thanks to the most intuitive online user experience, unique processes like automated cash management and best in class reporting.

And finally, advisers can use our platform as a catalyst for growth. We offer a wide range of Discretionary Investment Managers, which means advisers can serve a wider range of clients on the platform. In addition to this, our market leading family linking service provides an effective way for advisers to turn one client into many, by creating a family office proposition.

Q *1.11 What's different about this platform?*

A Here are ten examples of how Quilter's platform continues to differentiate and deliver value to you and your clients:

- No unexpected additional charges - Unlike some other providers, Quilter does not currently make any additional charges for withdrawals, re-registration or switching unit trusts and OEICS
- A leading range of products and trusts, including our flagship Collective Retirement Account – the most versatile pension in the market with nine ways of withdrawing clients' money
- Access to the CashHub, an award-winning online cash portal, offering a range of savings accounts with competitive rates of interest from a variety of banks
- Prefunding for all switches, new business and top-ups, and tax relief on pensions to ensure your clients' money is invested for longer
- Market-leading, integrated financial planning tools to help you with tax planning, ongoing suitability and client reporting
- Access to WealthSelect, our actively managed, discretionary investment solution enabling you to outsource the asset allocation, manager selection, and day-to-day running of clients' portfolios to our team of experts, at a very competitive cost
- Easy and efficient straight-through online processing saving you time and money
- Defaqto 'Gold' rated platform, pension and investment bond service
- Access to our experienced team of technical experts for all aspects of financial planning
- A strong and sustainable platform, with continued investment being made into its future.

Q *1.12 What type of clients can manage their investments on your platform?*

A Quilter's platform is designed for UK retail investors – these could be private individuals, trustees or corporations.

Stability

Q *1.13 How financially secure/strong is the UK platform?*

A Quilter's platform is part of Quilter plc, a leading provider of advice, investments and wealth management in the UK.

The business entities that comprise Quilter's platform, Quilter Investment Platform Limited (QIPL) and Quilter Life & Pensions Limited (QLPL) are regulated firms. This means they must comply with the rules of the regulatory regime relevant to them.

Some key details in relation to these entities are as follows:

- **Assets under management:** £117.9bn (as at 30 June 2026)
- **Gross sales:** £16.4bn (as at year end 31 December 2025)
- **Net Client Cash Flow:** £8.7bn (as at year end 31 December 2025)
- Whilst credit/financial strength ratings may not reflect the potential impact of all risks related to a firm, independent financial services research firm, AKG, has awarded a financial strength rating of A ('Superior') for QIPL and B+ ('Very strong') for QLPL as at 27 October 2025
- QLPL is well capitalised, with a Solvency II ratio of 139% as at 31 December 2025. Solvency II focuses on the amount of capital that EU insurance companies must hold to reduce the risk of insolvency. A Solvency II ratio is a key measure used to demonstrate the financial strength of a business to its stakeholders, including the regulator and its customers

  QIPL is an investment firm subject to the Investment Firms Prudential Regime (IFPR). As at 31 December 2025, QIPL maintains own funds in excess of the own funds threshold requirement ('OFTR') in order to meet the overall financial adequacy rule. The OFTR is determined by considering the level of own funds required to address risks from ongoing activities, and the own funds necessary to complete an orderly wind-down.
- Quilter's platform is the largest retail advised platform in the UK by assets under management[1]
- Quilter's platform is the second most used platform among advisers[2] with over 4,000 active third party UK advice firm relationships.

[1] *Source: the lang cat Platform Market Scorecard, March 2026*
[2] *Source: Investment Trends UK Adviser Technology & Business Report, May 2025*

Q *1.14 Has the platform made a profit or loss over the last three years?*

A The platform business is comprised of two segments: Quilter Investment Platform Limited (QIPL) and Quilter Life & Pensions Limited (QLPL).

The last three years' Adjusted Profit before tax (AP) and Net Flows for the platform business segment are shown below:

31 Dec 2023		31 Dec 2024		31 Dec 2025	
AP (£m)	Net flows (£bn)	AP (£m)	Net flows (£bn)	AP (£m)	Net flows (£bn)
124	**1.1**	**148**	**4.9**	**175**	**8.7**

Source: Quilter plc 2025 full year results, March 2026

Q *1.15 What independent credit/financial strength ratings have you been awarded?*

A Whilst credit/financial strength ratings may not reflect the potential impact of all risks related to a firm, independent financial services research firm, AKG, has awarded a financial strength rating of A ('Superior') for QIPL and B+ ('Very strong') for QLPL as at 27 October 2025.

Q *1.16 How would you describe the sustainability of your business model?*

A Quilter's platform is a leading investment platform provider of advice-based wealth management products and services in the UK. Since 1979, we've worked hard to tailor our proposition to match the changing needs and requirements of advisers and their clients.

Our platform is the largest retail advised platform in the UK by assets under management[1], well positioned in a market benefitting from strong structural growth drivers. The advised platform market continued to grow in 2025, with assets reaching £753.6bn. This is the highest level in 5 years and up 15.1% year on year, making Quilter's market share at 13.9% of the total market[2]. Regulatory and digital trends have encouraged flows to consolidate onto platforms and we expect those trends to continue.

The sustainability of Quilter's business model is dependent on several factors, including the strength of our financial position, the quality of our products and services, the company's reputation, and our ability to attract and retain clients. This is evidenced in the following ways:

- We've achieved an AKG financial strength rating of A (Superior) in 2025, and hold over £104.5bn AuM as at 31 December 2025
- Quilter's platform (Quilter Investment Platform Limited and Quilter Life & Pensions Limited) continue to make a profit, generating adjusted profit before tax of £175m for the full year 2025
- Our award-winning online platform offers state-of-the-art technology, providing access to a comprehensive range of products and investments designed to meet the needs of our clients
- We're constantly re-investing in improvements and technology upgrades, both for our advisers and their clients
- We've embedded environmental, social and governance (ESG) considerations across the business, with the understanding that responsible business management is key to an organisation's long-term success
- We're helping advisers build relationships across the generations, with intergenerational wealth transfer supporting the future sustainability of the industry.

This proposition allows us to help clients achieve their goals and adviser firms run efficiently and grow their business.

[1]Source: the lang cat Platform Market Scorecard, March 2026
[2]Source: the lang cat, State of the Platform Nation 2025-2026 report

Q *1.17 How financially secure is the parent company?*

A Following significant transformation activity, Quilter plc's business strategy of integrating distribution, investment platforms, discretionary fund management and multi-asset solutions is performing well; contributing to the strength of new flows into the Quilter group's various businesses.

We're proud to deliver financial strength and stability for clients in the following ways:

- **A professional seal of approval gives our clients peace of mind**
  Fitch's rating for Quilter is A (as at 22 May 2026), meaning they consider us to have 'high credit quality' and think our ability to pay our financial commitments is strong.
- **For financial experts, our numbers add up**
  Financial experts look at a company's solvency ratio to assess the strength of its financial resources (cash, debtors and other assets). At year-end 2025, our impressive Group solvency II ratio of 204% demonstrates our significant financial strength. Further information can be located on our website with the link ***plc.quilter.com/investor-relations/results-and-presentations/***

- **Clients can feel comfortable they're investing with a trusted brand**
  Quilter is listed alongside other well-known household names on both the London Stock Exchange, and the Johannesburg stock exchange and is placed within the FTSE 250 Index of leading companies.
- **We have scale to be there for our customers in tough times as well as good**
  In total, we manage more than £141.2bn of assets as at 31 December 2025.
- **With Quilter, you're choosing a company with a far-reaching impact**
  As a large contributor to the economy, our 3,000+ employees actively contribute to the communities in which we operate. We are committed to being a responsible business; one which delivers positive impacts for customers, colleagues, and communities. Our approach to responsible business is outlined in our 'Shared Prosperity Plan', which documents our progress in three key areas of Financial wellbeing, Inclusive growth and Responsible investment.

Q *1.18 Where does the platform sit within the strategic direction of the group?*

A The platform is regarded as a core element to Quilter plc's group. This means Quilter plc is fully committed to the future development of the platform and significant investment is being made to ensure it continues to meet clients' and advisers' needs into the future.

Q *1.19 What is your recent Pillar 3 disclosure?*

A Since 1 January 2022 Quilter Investment Platform Limited is now subject to the UK Investment Firm Prudential Regime (IFPR), and the Capital Requirement Directive (CRD IV) no longer applies to the business.

Going forward Quilter Investment Platform Limited will produce a public disclosure document in line with the IFPR requirements.

You can still view the public disclosure (Pillar 3) documents for Quilter Investment Platform Limited produced in line with the CRD IV requirements here:
plc.quilter.com/investor-relations/regulatory-reports-and-company-disclosures/

Technology

Q *1.20 Do you own and administer your own platform technology?*

A Our platform technology is provided and maintained by FNZ, a proven platform supplier and outsourcer that supports significant scale on behalf of a number of the UK's major financial institutions.

With over 5,000 technology and investment employees across eighteen international markets, FNZ offers strong expertise and scale and is highly regarded in the industry. FNZ is trusted by more than 650 financial institutions worldwide and manages over $1.5 trillion assets on their platform.

The efficient nature of FNZ's technology allows us to direct our resources towards the areas of differentiation, shown below, that advisers have told us are important when selecting their preferred platform.

- Quality of our people and our service
- Breadth of adviser support and depth of technical expertise
- Range of adviser tools
- Simple and intuitive online user experience

Q *1.21 What are you doing to ensure the platform can support my clients in the future, as well as now?*

A In a rapidly evolving Financial Advice industry, our focus is on doing what is best for our customers.

FNZ's sophisticated and configurable technology and services mean we can benefit from their agile continuous change cycle, allowing regulatory change to take place in a systematic and efficient way so we can focus our wider efforts on truly differentiating the service and experience our advisers and your clients have.

We will continue to invest in the quality of our people and the customer service they provide, our adviser support, the tools and usability of our online portals and the variety of product wrappers and features, which we know are all important to advisers in choosing our platform.

Q *1.22 How would you describe the scalability of your platform?*

A With over 30 years' platform experience, Quilter has developed a strong and flexible infrastructure. As a result we have an industrial strength platform, with £117.9bn assets under management (as at 30 June 2026).

Our partnership with the platform technology provider, FNZ, ensures we are able to continue handling the rapidly growing number of users and transactions currently being experienced and projected into the future.

FNZ was founded in 2004 and entered the UK platform market in 2005. FNZ is a proven platform supplier and outsourcer that supports significant scale on behalf of a number of the UK's major financial institutions. With over 5,000 technology and investment employees across eighteen international markets, FNZ is trusted by more than 650 financial institutions worldwide and manages over $1.5 trillion assets on their platform.

Q *1.23 What due diligence process does your company perform prior to the appointment of an outsourced service provider?*

A We would conduct an appropriate due diligence assessment of the supplier, including selection criteria and whether the supplier has appropriate governance, the required insurance cover, risk management and internal controls in place to perform the outsourced service or function in accordance with applicable regulations.

The due diligence exercise must include (but is not necessarily restricted to) the following aspects relating to each potential supplier:

- Financial robustness and security
- Internal controls
- Operational capabilities and the ability to scale operations in accordance with Quilter plc's needs or business needs
- Business continuity planning
- Information security and risk controls, procedures and policies
- Insurance cover and limits
- Staffing policies
- Ability to deliver service requirements and other criteria as defined in the initial selection criteria.

Business continuity

Q *1.24 Describe your business continuity plan.*

A Quilter maintains programmes for Operational Resilience, including Business Continuity Management and IT disaster recovery. This ensures that client data and critical business services will be recovered in the event of a major incident.

This programme is overseen at Board level along with a documented record maintained on an annual basis for our regulators. We require that business continuity plans are maintained, detailing critical business services and applications, tasks and dependencies. Quilter maintains Incident and Crisis Management Plans with a supporting team that can be invoked following an incident.

Business continuity plans are reviewed, as a minimum, annually and updated following any changes within our business.

Q *1.25 Do you have a disaster recovery process?*

A Quilter's operational resilience control environment is provided via group-wide oversight (a central operational resilience function) and documented BCP/DR and crisis management standards, supported by formal incident management requirements (categorisation, escalation, governance, trend reporting and crisis/BC alignment).

Disaster recovery processes are tested as per a defined test cycle with any observations from the tests then being used to further improve recovery plans and capability.

We define and maintain key design standards which include minimum acceptable levels of resilience and recovery for all IT services based upon their assigned criticality.

Frequent backups are taken, with copies maintained securely offsite, to enable data recovery as part of the business continuity programme.

Q *1.26 How do you ensure data and system security?*

A The safety and security of data and information is everyone's responsibility, and is of key importance to Quilter. We ensure that its capture, storage, processing, transmission, and destruction is secure at all times, and we do so by employing a 'defence in-depth' model that comprises organisational, technical and procedural controls. These are managed by our Information Security team.

Quilter's IT infrastructure is kept in secure cloud data centres. Quilter maintains a Security Incident Response Framework comprising scenario-driven playbooks and runbooks (e.g. malware, ransomware, denial of service). These are regularly tested and updated, including tabletop exercises. Third party security testing organisations are also regularly used for more in-depth inspections, and issues from these activities are logged, reviewed and tracked through to their documented resolution.

Access to data and information is provided on a need-only basis and is strictly controlled by procedures that require specific authorisation, formal reviews and approval processes and audits. Changes to system data go through a change control process which requires formal review and approval both before and after the change is committed, and all data fixes are audited and auditable.

Access to removable media (for example USB drives) is by exception, and controlled by approvals. All emails and documents created within the organisation are digitally categorised as Public, Internal, Confidential or Restricted. These are then analysed by Quilter's Data Loss Prevention tool when being sent externally, and any flagged material is reviewed.

Client account-specific information is only provided to external parties that are authorised to receive this information, and only once ID verification checks are completed for that account.

Quilter has an Information Security Training and Awareness programme in place for employees on subjects such as email security, phishing, social engineering and password security. It's delivered through a variety of channels such as online workshops, in-person events (when permitted), Intranet information libraries, Computer Based Training, internal and external blogs, articles, and exercises such as phishing simulations.

Third parties that collate, process or store sensitive information on behalf of Quilter, or those that have access to our systems, are continually assessed, from selection and contractual negotiation through to service delivery, to ensure they continue to meet our

requirements with respect to data and information security. Suspicious activity, which includes movement of sensitive data, is flagged and reviewed.

Q *1.27 What is Quilter doing for the GDPR and Data Protection Law?*

A

Current Law

Even after the UK's withdrawal from the European Union (Brexit), UK companies will find themselves needing to comply with the GDPR if they are offering goods or services to EU citizens or monitoring their behaviour. The UK itself implemented the UK Data Protection Act 2018 and carried almost all of the GDPR into UK law so our obligations remain unchanged in practice.

Joint responsibility

We consider ourselves as having 'joint responsibility' with you for processing, maintaining and managing your client data. We are classed as 'Data Controller' of our customers' personal data. If you receive a request (and there is a valid reason) to delete or restrict the processing of a client's information, or to provide copies of all personal identifiable data, you should also ask us to comply with this request. We will do so, as long as we do not break other business compliance rules.

Data security

Security is key and we have systems, processes and people in place who monitor your data and that of your clients within our systems, looking for ways to prevent unauthorised access and keep it safe.

Data incidents and breaches

If you experience a data breach involving your clients, you should advise us as soon as practically possible as we may be obliged to notify the relevant supervisory authority within 72 hours.

Managing our data protection obligations

We have a dedicated data protection team, led by our Group Data Protection Officer, that manages our compliance activities and leads the development and implementation of any changes required.

Everyone in our business receives training on data security, including their responsibility in taking care of it.

Reputational risk

Maintaining our customer and personal data is at the heart of our controls and we know how damaging it would be to us, to our advisers and our customers should a data breach occur.

Q *1.28 Describe your risk management philosophy.*

A Our risk management framework is based on risk management principles.

The top three are:

1. A strategy that is documented and well communicated must be in place for managing risk across the organisation, and the strategy must also include consideration of the relationships between risks.
2. Risk governance structures must be in place to ensure that all applicable statutory and regulatory requirements and group risk management standards are met.
3. Responsibility and accountability for risk management must be clearly assigned throughout the organisation, with the aim of fostering an open and transparent organisation culture that encourages the right behaviours.

Q *1.29 How is risk management and governance structured within your business?*

A Quilter plc has a comprehensive governance and risk management framework in place across all of its businesses. This includes a set of statements, measures and tolerances which define the level of risk exposure which the businesses are willing to accept, together with regular monitoring and reporting.

The Quilter board and that of each legal entity within the Quilter businesses are responsible for the oversight of business performance, governance and control and satisfactory discharge of fiduciary and other applicable legal and regulatory duties.

Each board is also responsible for ensuring that its business unit operates in accordance with the group operating model and underlying policies, practices and procedures. The board of Quilter and each legal entity has a responsibility to oversee the adequacy of risk management.

The Quilter Board Risk Committee reviews management's recommendations on risk and specifically the structure and implementation of the enterprise risk framework including:

- the quality and effectiveness of the internal controls
- risk appetite
- risk profile
- capital management processes
- risk management framework
- measurement of risk
- capital allocation
- regulatory risk
- business planning
- scenario analysis and stress testing
- risk strategy
- risk policies and standards
- annual and interim reports and accounts for each risk category
- risk governance framework.

Q *1.30 How is compliance structured within your business?*

A Our compliance team is responsible for providing compliance advice, undertaking compliance monitoring and reviewing regulatory developments in relation to the Quilter business.

The Compliance Director reports to the Chief Risk Officer.

Policies and procedures are reviewed regularly by the team to ensure they remain up-to-date and appropriate and will be updated following any regulatory, process or system changes. All formal policies are subject to a documented formal yearly review.

Q *1.31 What financial protection do clients have when investing through your platform?*

A When you invest through a reputable product provider like Quilter, there are a number of safeguards to protect client money in the highly unlikely event that the provider, or the manager of the assets clients are invested in, becomes insolvent.

Whichever product your clients hold with us:

- client money and assets are segregated and ring-fenced from the company's own money and assets
- we, the custodian and the asset managers you are invested in provide extensive financial reports to the regulators, so that they can be assured there are enough assets to meet liabilities
- if all other protection fails, clients may be protected by the Financial Services Compensation Scheme (FSCS).

To find out more about the safeguards that are in place and what level of FSCS protection may be available, please see our document 'How Your Money Is Protected' by clicking the link below:
quilter.com/siteassets/documents/platform/support/20339_protecting-your-money.pdf

Q *1.32 Who acts as nominee?*

A Quilter Investment Platform Nominees Limited is the nominee for the Collective Investment Account, ISA and Junior ISA. ETIs are held in the name of the nominee company of our nominated stockbroker, however, clients remain the beneficial owners of the investments.

Q *1.33 What level of professional indemnity cover do you have?*

A Quilter has a Comprehensive Crime and Civil Liability (Professional Indemnity) Insurance policy which covers Quilter plc and its subsidiaries (collectively, "Quilter"). The level and quality of cover is based on a benchmarking exercise conducted by Quilter's insurance brokers and it takes into consideration a number of factors, including, but not limited to, Quilter's risk profile.

Q *1.34 Do you have a plan of action for orderly platform wind down, should the situation occur?*

A The difficulties experienced by the platform Avalon in 2016 are evidence of the need to have a back-up plan, to minimise the inconvenience to customers and advisers should the platform have to be wound down.

Quilter Investment Platform Limited has carried out a detailed assessment of the potential drivers of a decision to wind down the platform and the process and costs of doing so. This includes a comprehensive assessment of the customer journey throughout the process. The plan includes a detailed timeline of steps that would need to be undertaken to complete the wind-down in an orderly manner, and includes key considerations for ensuring customers receive the most appropriate solution aligned to their individual needs at each stage. In addition, the plan includes key milestones for communications to customers as well as plans for handling an increase in ad hoc customer queries through our Service Centre, developed in connection with the customer operations department.

The wind-down plan is a component of the Internal Capital and Risk Assessment (ICARA) process. The ICARA process is subject to review and approval by the Board of Directors and the Quilter Board Risk Committee on a regular basis, and is also subject to review by the Financial Conduct Authority (FCA) on a periodic basis.

Q *1.35 Has your organisation achieved ISO27001?*

A Quilter have an information security framework in place for managing information security across the business. It encompasses the principles defined within ISO27001, NIST and the ISF standard of Good Practice for Information Security.

Quilter are certified PCI-DSS compliant for the FNZ platform, certification is at Merchant level (SAQ A).

Section 2

Product range

Q *2.1 Which products are available through Quilter's platform?*

A **Quilter's platform offers the following products:**

- General investment account (Collective Investment Account)
- ISA – with flexi ISA functionality
- Junior ISA
- Personal pension (Collective Retirement Account)
- Junior personal pension (Collective Retirement Account)
- Onshore bond (Collective Investment Bond).

The platform also offers access to a savings marketplace, the CashHub, powered by Bondsmith.

Q *2.2 Describe the features of your ISA.*

A

- The ISA manager is Quilter Investment Platform Limited and the nominee company is Quilter Investment Platform Nominees Limited
- Over 3000 unit trust and OEIC funds to choose from
- Access to Exchange Traded Funds (ETFs) , Exchange Traded Commodities (ETCs) and Investment Trusts
- Cash functionality
- Flexi ISA capability allowing clients to meet any short-term cash needs
- Facility to 'gross up' contributions to include adviser fees and optimise the client's annual ISA allowance
- Straight-though, online Bed & ISA facility to move funds from the client's Collective Investment Account
- Electronic re-registration
- Online one-off customer withdrawals of up to £75,000, as well as regular withdrawals.
- Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month.

Q *2.3 Describe the features of your Junior ISA (JISA).*

A

- The ISA manager is Quilter Investment Platform Limited and the nominee company is Quilter Investment Platform Nominees Limited
- Open to children under the age of 18, offering tax-efficient savings for future generations
- Automatic client linking to the parent or guardian account(s) for calculation of the Service/Product Charge
- Over 3000 unit trust and OEIC funds to choose from
- Access to Exchange Traded Funds (ETFs) , Exchange Traded Commodities (ETCs) and Investment Trusts
- Cash functionality
- A minimum investment of £500 for lump sums and £50 for regular investments
- We accept full transfers of existing JISAs and Child Trust Funds
- Regular contributions can be made on any day from 1st – 28th of the month
- Withdrawals are not possible from a JISA
- We will automatically convert to an ISA on the child's 18th birthday.

Q *2.4 Describe the features of your unwrapped general investment account.*

A

- The plan manager of our Collective Investment Account is Quilter Investment Platform Limited and the nominee is Quilter Investment Platform Nominees Limited
- Over 3000 unit trust and OEIC funds to choose from
- Access to Exchange Traded Funds (ETFs) , Exchange Traded Commodities (ETCs) and Investment Trusts
- Cash functionality
- Trustee investments from registered pension schemes (SIPP and SSAS) are accepted
- Can be used as an underlying asset of an offshore bond, to switch between unit trust and OEIC funds free of any transaction charges
- The Capital Gains Reporting Tool is available to help you with your client's tax return
- Straight-through, online Bed & ISA facility to move funds to the client's ISA
- Electronic re-registration
- Online one-off customer withdrawals of up to £75,000 for accounts held in a customer's sole name
- Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month.

Q *2.5 Describe the features of your personal pension.*

A Our personal pension, the Collective Retirement Account (CRA), is a Defaqto '5 Star' service rated pension scheme provided by Quilter Life & Pensions Limited.

The CRA offers some of the most comprehensive withdrawal solutions in the market. This includes automated monthly income options that let a client take money out of their pension using only tax-free cash, or a combination of tax-free cash and taxable income. These options are designed so that you can tailor each CRA to meet your clients' needs, help continue to grow their pensions, be more tax-efficient and maximise their legacy if required.

The following features are available:

- The CRA is a multiple sub account model where uncrystallised and crystallised pension monies are held in separate sub accounts. This structure allows separate asset allocations for uncrystallised and crystallised savings, along with flexi-access drawdown and capped drawdown within the same client account
- Exchange Traded Funds (ETFs), Exchange Traded Commodities (ETCs) and Investment Trusts
- Cash functionality
- Re-registration functionality
- Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month
- Voluntary 'scheme pays' allowing customers to settle annual allowance tax charges for any pension scheme. Once established by the client, the CRA will pay HMRC as soon as possible after a request is received, minimising the risk of any late payment penalties associated with other options in the market
- The maximum age for all transfers (including uncrystallised) will be 85.

Nine flexible ways of withdrawing money from the CRA, all at no additional charge:

1. **Flexi-access drawdown options (FAD)**
2. **Capped drawdown**
3. **Lump sums from uncrystallised funds through FAD**
4. **Small pots –** Up to £30,000 can be taken as small lump sums from Collective Retirement Accounts which are uncrystallised. 25% of each payment will be tax-free with the balance taxed at the basic rate of income tax if we don't already hold a tax code. A small pots payment can also be made from a fully crystallised account with a value of £10,000 or less, in which case the whole amount is subject to income tax. If we don't already hold a tax code we will use an emergency month 1 tax code. Any higher or additional rate tax will be collected via the member's annual tax return.

Three tax-efficient* regular income options:

5. **Monthly payment is all tax-free –** We pay 25% of the amount crystallised as a tax-free lump sum. The residual crystallised amount is moved to the crystallised drawdown pot for future taxable income withdrawals
6. **Monthly payment is a mix of tax-free and specified taxable amounts –** We pay 25% of the amount crystallised as a tax-free lump sum and a specified part of the residual crystallised amount as taxable income. The balance will be moved to the crystallised drawdown pot for future taxable income withdrawals
7. **Monthly payment is 25/75% mix of tax-free and residual taxable amounts –** We pay 25% of the amount crystallised as a tax-free lump sum and the residual crystallised amount as taxable income

The above regular income options can be set up alongside existing flexi-access income withdrawals

**The tax treatment and efficiency of these options will depend on the individual circumstances of each client. Tax rules and their application may change in the future.*

8. **Open market option**
9. **Legacy planning death benefit options**

Is the Collective Retirement Account available for children?

- The Collective Retirement Account (CRA) is also available for children and has no minimum age requirement to open an account. HMRC rules only allow for a parent or legal guardian to open an account on behalf of a child, as under the regulations only a parent/legal guardian is allowed to make the relevant tax declarations on behalf of the child. The account is held in the child's name, while the parent or legal guardian remains the registered contact until the child reaches age 18. At that point, responsibility for the account automatically transfers to the child
- The CRA provides the same investment options, pension benefits and tax-efficient growth opportunities as those available to adult account holders. Contributions can be made by parents, grandparents or other third parties, subject to pension contribution limits. For children with no relevant earnings, up to £2,880 can be contributed each tax year, with basic-rate tax relief added by HMRC, creating a maximum annual gross contribution of £3,600. Cannot normally be accessed until the minimum pension age applicable at the time benefits are taken.

Q *2.6 Describe the features of your onshore bond*

A

- Our onshore bond, the Collective Investment Bond (CIB), is a Defaqto '5 Star' rated bond provided by Quilter Life & Pensions Limited
- The same charging structure and fund range as the other available wrappers
- A range of trusts available for effective estate planning
- Can be used in conjunction with the Collective Investment Account for tax-efficient withdrawals
- Capital Protected Death Benefit is available at an extra charge, providing protection of capital in the event of the life assured's death
- Increased bond assignment options, with individual segments being assigned to another entity to create a new 'sub account'. This will provide each legal owner with greater flexibility on how they manage their holdings
- Online one-off customer withdrawals of up to £75,000 for bonds held in a customer's sole name.

Q *2.7 Describe the features of the CashHub*

A The CashHub is an online savings marketplace that can be accessed through Quilter's platform. It offers a choice of savings accounts from a regularly reviewed panel of banks and building societies. The provider is Bondsmith Savings Limited and the nominee is Bondsmith Savings Nominees Limited. The CashHub is distributed by Quilter Investment Platform Limited.

The CashHub enables clients to:

- Compare a range of savings accounts with competitive rates of return
- Choose from a selection of easy access, notice and fixed term accounts
- Pay money in, withdraw, and move money from one savings account to another
- View cash savings alongside their Quilter investments using a single online Customer Centre login

Visit our ***CashHub page*** for more details or access CashHub due diligence information ***here***

Q *2.8 What are the minimum investment amounts into each product?*

A The minimum investment amounts and other key product information is available in our guide 'Our platform - at a glance': ***quilter.com/siteassets/documents/platform/support/21061-at-a-glance-cb3.pdf***

Q *2.9 What trusts do you have available?*

A We offer our own range of trusts for use with our tax wrappers, and we will also consider trusts that have been set up externally and note them accordingly.

- Absolute trust (Collective Investment Bond (CIB))
- Discretionary trust (CIB)
- Loan trust (bare or discretionary version (CIB))
- Discounted gift trust (bare or discretionary version (CIB))
- Lifestyle trust (CIB) - designed to help reduce an IHT liability where flexible access to the trust fund is required
- Designated account (Collective Investment Account (CIA))

Section 3

Charges

Q *3.1 What are the charges for using your platform?*

A Our unbundled charging structure, combined with very competitive fund costs mean your client can achieve great value on the total cost of ownership of an investment with Quilter.

- One simple tiered Product/Service Charge across all wrappers with a rate that reduces as our platform investments increase
- No wrapper charge
- The best fund deals in the market
- No transaction fees for withdrawals and trades on unit trusts and OEICs. Please refer to 3.2 below for information on transaction fees for Exchange Traded Instruments and Exchange Traded Funds.

Product/Service Charge	
Total amount invested	Percentage Product/Service Charge each year
First £50,000	**0.35%**
From £50,000 to £250,000	**0.25%**
From £250,000 to £750,000	**0.20%**
More than £750,000	**0.15%**

Clients can benefit from family linking, with the potential to reduce the Product/Service charge, please see 3.4.

The Product/Service Charge is taken from the account by unit deduction.1/12th of the charge is taken monthly on the charge deduction date.

There is no Product/Service Charge applied to the CashHub.

Bondsmith are paid directly by the savings account provider. This is up to 0.25% of the account values held with the Savings Account by the trustees. It is deducted from the interest rates before they are displayed so the interest rate that is shown is the rate that is paid. Bondsmith pay Quilter a distribution fee of up to 0.15%.

While it does not attract a charge, the total amount of cash savings held in the CashHub is included in the combined value of your investments used to determine the annual charge rate for the accounts and bonds on our platform, potentially reducing the overall charge.

Q *3.2 How is product cash and interest managed?*

A There is no Product/Service Charge applied to any money held in cash.

For the CIA, ISA, JISA or CRA, Quilter will retain the difference between our published interest rate and the rates paid by our banking partners.

For more information on our external banking partners, interest rates paid on cash and details of the rate we retain please see **Interest rates on cash**

Cash held in the CIB will be used in some instances to fund adviser fees or Quilter's charges. This is known as transactional cash. Transactional cash cannot be selected as an investment within this product. In the CIB, we set a rate of Quilter interest on cleared transactional cash and make an adjustment to the bond on a monthly basis to reflect this. The rate takes into account a tax deduction equivalent to the basic rate of tax - currently 20%.

Q *3.3 Are there any third party costs?*

A Asset charges and adviser fees are the only costs in addition to Quilter's charges.

Quilter's size and scale means we can negotiate with fund managers to offer your clients some of the most competitive fund deals in the UK market.

Where possible, we have also arranged for the removal of fund manager initial and exit charges for unit trusts and OEICs available through our platform. A minority of these unit trusts/OEICs are dual-priced (they have a bid/offer spread), or have some fund manager administration or dealing costs applied when purchasing them. These additional costs will apply to each platform, regardless of whether or not there are any explicit fund manager initial charges.

Our funds list (link below) clearly shows the charges and any spreads that may apply for all of the funds we have available through the platform. They are updated weekly.

We have also negotiated the best fund manager rebates where they are due, which we pass back in full on Charge Basis 3 to our customers in the form of units.

Funds list:

To view our full investment range, click the below link for our Fund Centre and ETI list:
quilter.com/investments/platform-funds/

Exchange Traded Funds (ETF), Exchange Traded Commodities (ETC) and Investment Trusts

As trading in exchange traded investments requires a stockbroker, a dealing charge will apply every time an asset is bought or sold via the exchange. To open up investment opportunities for more of your clients, we've partnered with an experienced stockbroker, to provide a competitive and straightforward service with a dealing charge based on how the trade is instructed:

Trades inside a model portfolio
- £1 per asset being bought or sold

Trades outside of a model portfolio
- £3.50 for trades valued at less than £10,000
- 0.035% for trades valued at more than £10,000
- £15 cap per asset trade

Please note, stamp duty* and a PTM levy apply when trading investment trusts.**

** Stamp duty - HM Revenue & Customs (HMRC) charges stamp duty of 0.5% on purchases.*

*** PTM levy - £1.50 applies to each investment trust trade valued over £10,000.*

Q *3.4 Is family linking available?*

A To help you offer your clients a great deal and drive down the cost of investment, we offer extensive family linking. Clients can be linked across four generations to an unlimited number of family members.

Linking the value of a client's assets to those held by their family members means we will base the percentage charge they pay – and the percentage charge their family members pay – on the total value of investments held by everyone who's linked. Because the charge rate is lower the more that's invested, everybody benefits.

The following investors are eligible for family linking:

- the following family members could be linked: Grandparents, Parents*, Spouse/Civil partner**, Brother, Sister, Children*** and Grandchildren*** of the client
- Trusts - where the client or the client's family members as listed above are the settlor of the trust (including cases where he/she is investing for children/ grandchildren)
- SIPP investing in the Collective Investment Account (CIA) - where the client or the client's family members as listed above are the SIPP member
- CIA held in an offshore bond where the client and/or the client's family members as listed above are the bond holders or settlors of the bond held in trust

The Product/Service Charge (applicable to investments held under Charge Basis 3) is currently calculated based on the total value of assets held under a single Customer Reference number. The more assets a client holds, the lower the percentage charge. Where we accept a request to link clients, this benefit will extend to the assets held under any linked Customer Reference numbers.

** Parents include in-laws*
*** as defined by the Civil Partnership Act 2004*
**** Children and Grandchildren include in-law, step and adopted*

Q *3.5 Do you have a different charging structure for legacy business?*

A Yes, there are two bundled charging structures which have been closed to new business since December 2012. Existing clients on these charge bases will hold either a Collective Investment Bond or a Collective Retirement Account that started before that date. Collective Retirement Accounts can optionally upgrade to our unbundled charge basis.

All ISA, JISA and Collective Investment Accounts are held under Quilter's unbundled charge basis (Charge Basis 3) as a result of the Sunset Clause.

Charge Basis 1 – the account is subject to a single annual Investor Charge of £97.02 (which increases each year in June by AWE) and pays adviser commission.

Charge Basis 2 – the account is again subject to the single annual Investor Charge of £97.02 but it instead facilitates adviser fees.

There are no exchange traded investments under these charge bases and therefore our dealing charge does not apply.

Where advisers may have clients on both bundled and unbundled charging structures, the wrappers that are on the bundled charging structure will be included when calculating the Product/Service Charge for products held on the unbundled charging structure, reducing the charge for the customer.

Q *3.6 What options are there for adviser fees?*

A We offer a range of flexible adviser charging options available across all our wrappers for you and your client to choose from, including tiered adviser charging for ongoing servicing fees. You can set different fees for each account they hold. (See table below)

The percentages quoted are the maximum limits that Quilter will facilitate. They do not represent the limits agreed between client and adviser.

You can choose the frequency that the adviser ongoing servicing fee is paid - monthly, quarterly, half-yearly or yearly.

You can set tiers and percentages for your adviser charging to enable multiple different charging structures, including fee capping. For more information on how this works, visit our website ***www.quilter.com/platform/tiered-adviser-charging/***

Your client will need to sign an adviser fee authorisation form, which you must retain in your records. A pre-populated version is available for you to print during the online application process.

	Collective Investment Account (CIA)	ISA and Junior ISA	Collective Retirement Account (CRA)	Collective Investment Bond (CIB)
Adviser initial fee - lump sums and transfers	Up to 50% (not applicable for re-registration)	Up to 7% (not applicable for re-registration)	Up to 7%* (not applicable for re-registration)	Up to 7%
Adviser initial fee - regular investments	Up to 50%, payable as a monetary amount only. Can be taken over a period of up to 24 months. It will be deducted separately from the regular investment.			Not applicable
Adviser ongoing servicing fee	Up to 50% per year.	Up to 1.5% per year.		
Adviser ad hoc fee	Up to £10,000	Up to £10,000		

* For CRA, where full immediate crystallisation and maximum tax-free cash are selected for a new lump sum investment or transfer, an initial fee requested as a percentage will be calculated **after** the deduction of tax-free cash.

Q *3.7 Can you facilitate adviser cross-wrapper fees? (For example, deducting the fee for the advice on an ISA from the client's Collective Investment Account instead)*

A We cannot facilitate this, however we do facilitate ad hoc adviser fees which could be used for this purpose.

Q *3.8 Are fees and withdrawals deducted from the cash account?*

A

Funding fees and charges

We will deduct fees and charges from cash within your client's account. Once cash is depleted we will automatically sell units proportionally to the equivalent of six months' worth of fees and charges. This is to provide sufficient cash to meet future fees or charges without needing to sell assets on a frequent basis. We will only sell units equivalent to a maximum of 0.75% of the value of an account at any one time.

Funding income and regular withdrawals

ISA and CIA:

- Assets will be sold proportionally (including cash and exchange traded investments) or clients can choose specific assets to sell, including cash.
- Where a specific asset is selected, once the asset is depleted our system will default to deducting from cash then any shortfall proportionally across remaining assets, ensuring regular withdrawals are always paid.

CIB:

- Assets will be sold proportionally (including cash) or clients can choose specific assets to sell.
- Where a specific asset is selected, once the asset is depleted our system will deduct units proportionally in order to fund the payment.

CRA:

- Assets will be sold proportionally (including cash and exchange traded investments) or clients can choose specific assets to sell, including cash.
- In the crystallised pot, where a specified asset is selected, once the asset is depleted our system will deduct units proportionally to ensure regular withdrawals are always paid.
- For tax-efficient regular income options (TRIO), where a specific asset is selected, once the asset is depleted our system will default to deducting from cash then any shortfall proportionally across remaining assets, ensuring regular withdrawals are always paid.
- In addition you will be able to specify specific assets for crystallisation and to fund tax-free cash, where necessary.

Q *3.9 How do you deal with fund rebates?*

A We have negotiated with fund managers to repay a proportion of their annual charge as a rebate. The ways these are treated vary between the three charge bases (two of which are for legacy business).

Charge Basis 1

(Investor Charge and Commission) – Bundled, closed to new business

We retain a proportion of the rebate to offset our administration costs, and the remainder is used to pay ongoing trail commission to the adviser. This represents a further saving on the overall cost of the investment.

Charge Basis 2

(Investor Charge and Adviser Fees) – Bundled, closed to new business

We retain a proportion of the rebate to offset our administration costs, and pay the rest to the client in the form of additional units. This has the effect of reducing the fund manager charge on the fund.

All ISA and Collective Investment Accounts held in the above charging structures were moved to the unbundled charging structure (Charge Basis 3) by the end of 2015, ahead of the Sunset Clause.

Charge Basis 3

(Product/Service Charge and Adviser Fees) – Unbundled

Any rebates received are repaid to the client in full in the form of units.

Q *3.10 Are there any plans to change your platform charges?*

A Quilter's pricing model has been designed to take into account the total cost of ownership (TCO) for a client. The elements of TCO are platform charge, the ongoing cost of fund (OCF), the adviser charge and any other service or transaction charges.

We have control over our Product/Service Charge and review this on a quarterly basis to ensure it is in line with market trends. The other element of TCO we can influence is the fund charge; we have a very flexible approach to fund pricing through the mechanism to pass on rebates and buying power to leading fund deals on behalf of your clients. We believe the market should not focus on headline platform price and place more emphasis on TCO. We strongly believe we have the right price levers to pull at the right time to address future downward pressure on pricing and deliver a competitive TCO for the client.

Section 4

Fund range and asset classes

Q *4.1 What investment range is available on the platform?*

A Our asset range gives you access to a wide range of over 3,000 unit trusts and OEICs, plus over 800 exchange traded investments (ETIs), including Exchange Traded Funds (ETFs), Exchange Traded Commodities (ETCs) and investment trusts.

To view our full investment range, click the below link for our Fund Centre and ETI list: ***quilter.com/investments/platform-funds/***

Q *4.2 What investment types are not available on the platform?*

A We do not offer access to the following investments at the current time:

- Structured products
- Hedge funds
- Direct Equities
- Commercial property

Q *4.3 Which asset classes are available?*

A

- UK equity
- Multi-asset and managed
- Global specialist
- UK fixed interest
- Europe
- North America
- Japan
- Emerging markets
- Far East (excluding Japan)
- International fixed interest
- Property
- Cash/money market

These are available to all clients within all wrappers.

Q *4.4 Do you offer discounted fund TERs/OCFs?*

A Quilter's size and scale mean we can negotiate with fund managers to offer your clients some of the most competitive fund deals in the whole UK market.

We have also negotiated the best fund manager rebates where they are due, which we pass back in full to our customers on Charge Basis 3 in the form of units.

Q *4.5 Are there any initial fees or switching charges?*

A

Unit Trusts & OIECs

Quilter does not charge for switching.

Where possible, we have negotiated the removal of fund manager initial and exit charges, however, it is important to remember that clients may still bear some fund manager administration or dealing costs when purchasing funds.

These additional costs would apply irrespective of whether you are investing with Quilter or through other platforms.

The visibility of these charges will vary according to the type of fund, for example dual-priced funds, such as unit trusts, may have explicit bid/offer spreads. Please check our asset lists for details of any initial charges and spreads which may apply.

Exchange Traded Funds (ETF), Exchange Traded Commodities (ETC) and Investment Trusts

As trading in exchange traded investments requires a stockbroker, a dealing charge will apply every time an asset is bought or sold via the exchange. The charges for trades on ETF, ETC and investment trusts are as follows:

Trades inside a model portfolio

- £1 per asset being bought or sold

Trades outside of a model portfolio

- £3.50 for trades valued at less than £10,000
- 0.035% for trades valued at more than £10,000
- £15 cap per asset trade

Please note, stamp duty* and a PTM levy apply when trading investment trusts.**

**Stamp duty - HM Revenue & Customs (HMRC) charges stamp duty of 0.5% on purchases.*
***PTM levy - £1.50 applies to each investment trust trade valued over £10,000.*

Q *4.6 Are clean share classes available?*

A Yes, we have also negotiated the best fund manager rebates where they are due, which we pass back in full to our customers in the form of units.

Q *4.7 Do you have any cash/deposit funds?*

A Cash can be held at product level for ISA, JISA, CIA and CRA. For CIB cash will be used to fund fees and charges, it will not be possible to select cash as an investible asset within the bond. Other cash funds, e.g. BlackRock Cash are available.

Discover how our cash facility is used and what interest is paid at ***quilter.com/investments/platform-funds/fund-research-and-information/interest-rates-on-cash/***

The platform also offers access to a savings marketplace, the CashHub, powered by Bondsmith to enable cash to be held outside of a Quilter product.

Q *4.8 How does the automated cash management option work?*

A To reduce the number of transactions on a client's account and to make it easier to trade, we have introduced an automated cash management functionality. This will ensure the process of paying fees and charges runs as smoothly as possible.

This will involve the platform selling a small number of units and holding them as cash on clients' accounts, typically every six months. We will only sell units equivalent to a maximum of 0.75% of the value of an account at any one time.

More information on funding fees, income and withdrawals and full details on our cash management can be found at ***quilter.com/siteassets/documents/platform/support/20349-straightforward-cash-management.pdf***

Q *4.9 Are the funds offered consistent across all wrappers?*

A Broadly the same asset range is available irrespective of the product wrapper required by the client. This makes it easier for you to manage your client's entire wealth and not worry about differences in the fund range when building portfolios. Even the tax charges on our Collective Investment Bond product wrapper are deducted separately, and not reflected in the fund price. In some cases not all funds are available for all products – for example, not all unit types (Inc and Acc) are available in the CIB. ETIs are also not available for the CIB.

Q *4.10 Do you have any packaged solutions for specific client needs?*

A Quilter Investors offers a range of multi-asset solutions to meet the different needs of your clients – targeting specific levels of risk, growth or income. The range includes:

– Cirilium

– Generation

– Income

– Creation

– WealthSelect (see next question).

For more information, please speak to your wealth management consultant or visit our website ***quilter.com/investments/multi-asset-investment-portfolios/wealthselect***

Q *4.11 Do you have any managed portfolios?*

A WealthSelect is an actively managed, discretionary investment solution enabling you to outsource the asset allocation, manager selection, and day-to-day running of clients' portfolios to our team of experts, at a very competitive cost. WealthSelect offers 56 portfolios, including Responsible and Sustainable options. They are available across eight risk levels that target a specific range of volatility and, depending on clients' responsible investment preferences, provide a choice of active, blend, or passive investment management.

WealthSelect currently has more than 138,000 advised clients entrusting over £25.4bn of their assets to our team of investment experts (as at 31 December 2025).

For more information please visit our website, ***quilter.com/investments/multi-asset-investment-portfolios/wealthselect/***

Q *4.12 Can my company run its own model portfolios?*

A Yes, advisers can set up an unlimited number of model portfolios. There are a number of features available inside model portfolios, some of these are:

– Adviser branded portfolios

– Versioning - This is version control for your model portfolios. It will make it easier for you to see which client is invested in each model and to keep track of who has recently rebalanced. When you make changes to a model portfolio a new version is created and the previous version becomes closed to new business

– Active edit - the ability to switch a single fund without triggering a rebalance

– Align to Target - This selectable option naturally rebalances your model portfolios whenever money flows in or out of a model portfolio. It does this by prioritising purchases in underweight assets and sales of overweight assets, reducing unnecessary trades in future and helping to reduce risk by ensuring your clients' portfolios stay aligned to your original asset allocation

– Enhanced auto-rebalancing options

– And finally the ability to have more than one investment strategy in each wrapper, which we are calling mix and match.

Clients' accounts can be linked to a portfolio and rebalanced or switched in bulk within minutes.

Q *4.13 Is there access to discretionary investment managers (DIMs) through the platform?*

A Advisers can use the services of DIMs registered with our platform. DIMs are able to build and maintain portfolios for advisers and their clients via the X-Hub facility.

The DIM can use the pre-defined portfolio functionality available on our platform when constructing model portfolios for the financial adviser and their clients.

The DIM can manage investments and switch the underlying funds within the model portfolios at their own discretion, subject to an investment agreement between the DIM and the client. DIM portfolio fees will be paid directly to the DIM. The fee amount and frequency will be set by the DIM, but must be discussed and approved with your client.

We offer a DIM service that meets specific criteria, to ensure the process is efficient and compliant. Quilter conducts its own due diligence assessment on the proposed DIM company to ensure we are comfortable that the firm is suitable. Quilter has relationships with a large number of DIM firms who offer a multitude of different strategies.

Over 140 DIMs are registered with our platform, and include:

8AM Global Ltd
AB Investment Solutions Limited
Albert E Sharp LLP
Asset Intelligence Portfolio Management
Atlantic House Investments Limited
Betafolio Limited
Binary Capital Investment Management Ltd
Bordier & Cie (UK) PLC
Brooks Macdonald Asset Management
Casterbridge Wealth Ltd
Collidr Asset Management
Copia Capital Management
Crossing Point Investment Management Ltd
EBI Portfolios Ltd
EQ Investors Ltd
Financial Express Investments Ltd
Hawksmoor Investment Management
Hymans Robertson Investment Services LLP (HRIS)
IBOSS Asset Management Ltd
Rathbones
King & Shaxson Asset Management
LGT Vestra
Liontrust Investment Partners LLP
MAIA Asset Management Ltd
Momentum Global Investment Management
Morningstar Investment Management Europe Ltd
One Four Nine PortfolioManagement
P1 Investment Management Limited
Psigma Investment Management
Quartet Capital PartnersLLP
Quilter Cheviot Limited
RSMR Portfolio Services Limited
Sanlam Investments UK Ltd
Sarasin & Partners LLP
Schroder Investment Solutions
Seven Investment Management LLP
Smith & Williamson Investment Management LLP
Square Mile Investment Services
Tatton Investment Management Ltd
Tavistock Wealth Limited.
TCF Fund Managers LLP
Tilney Asset Management Limited
Trust DFM
Waverton Investment Management Limited
Whitechurch Securities Ltd

Please note that each advisory firm must contract with a DIM before their portfolios become available for use with that advisory firm.

For more information on accessing the DIM service, please contact your consultant.

Q *4.14 How do you select the funds that you offer?*

A The fund range is driven by financial adviser demand, however in order to be added to the platform a fund must successfully go through a comprehensive due diligence process. This due diligence process involves four key reviews:

- Operational – can the fund be administered through Quilter?
- Regulatory – is the fund suitable for UK retail investors?
- Commercial – the fund must not have an initial charge to the client and we will look to negotiate a rebate on the annual management charge where possible.
- Legal – agreements must be robust so that they protect financial advisers and their clients.

Quilter is dedicated to providing a quality fund range, rather than simply offering any fund in the market.

The range of ETIs is driven by similar criteria and additionally we will review whether there is enough liquidity for regular trading of the asset.

Q *4.15 How do you ensure there is no bias towards a certain fund or fund manager, or your own solutions, in your literature and investment processes?*

A We present all assets in alphabetical order by asset manager, both in our asset lists and on the platform's asset research functionality, portfolio, switching and application sections. This includes funds and investment solutions we offer managed by Quilter Investors.

Our risk profiler tool was built in-house in collaboration with Willis Towers Watson and a consultant mathematician. The output can be mapped to scores from other external risk profiler tools such as Dynamic Planner and Defaqto. It does not push a particular product or asset in the output.

Q *4.16 Can I request that a fund is added to your fund range?*

A Yes, please request this through your consultant.

If approved we will carry out the due diligence procedure detailed in the answer to question 4.14. Timescale is dependent on the level of participation received from the fund group.

Q *4.17 Do you offer investments in multiple currencies?*

A All available funds and ETIs on our platform are denominated in Pounds Sterling.

Q *4.18 How do you notify advisers of fund event mailings to clients (eg for mergers, objective changes, suspensions or closures)?*

A We have a robust process in place for judging when details of a fund change should be shared with customers. The process is aligned to FCA guidelines and comparable to other providers in the UK. We will only write to customers about a material change to a fund for example when:

- The fund charges are increasing
- There's a material change to the fund or its objective
- The fund is merging or closing
- The fund name is changing and this may make the fund hard to recognise on websites or in other communications.

We send fund event alerts to advisers by email at the earliest opportunity to give them as much time as possible to prepare before their clients receive their own notification. The email provides a link to a webpage which contains further details on the fund event once they're available, for example:

- Key dates
- Impact on existing instructions (regular contributions, phased investments etc)
- Any changes to the fund's risk profile, objective or charging structure.

Section 5

Support services

Q *5.1 What support do you provide for using your online services?*

A Instant access training

For quick and easy training at your fingertips, our popular 'How do I' guides provide step-by-step summaries and videos explaining how to use our online platform. Covering everything from 'How do I find my way around online' to help with specific transactions like how to add employer contributions or an expression of wish.

Access our How do I guides online through your Platform Support Hub: ***quilter.com/support-hub/***

Additional support

Our dedicated Platform Specialists can provide you with training and support on using the online services and financial planning tools to their full potential. They can also show you how they can fit in with and complement your own processes and provide efficiencies to your business.

The Platform Specialists also run webinars on various areas of our online services and tools and send 'Hints and tips' emails with helpful hints for using these to your best advantage.

Please email ***PlatformSupport@quilter.com*** to request contact from your Platform Specialist, to register for the Hints and tips emails.

Q *5.2 What support can my firm expect on a daily basis?*

A Instant access daily support

Our dedicated Platform Support Hub provides instant access to the following support:

- Our popular 'How do I' videos and step-by-step guides
- The latest top content and platform support to keep you informed
- Instant answers to advisers' most common questions – no hold music involved!
- Technical articles to help with matters such as taxation, trusts and pensions
- An extensive range of tools to help you deliver great service

Access daily support online through your Platform Support Hub: ***quilter.com/support-hub/***

Additional support

Quilter's Customer Service Centre is available from 8.30am to 5.30pm Monday to Friday on freephone 0808 171 2626, to answer any queries financial advisers and their clients may have for new or existing business. There is also an email address for financial advisers and clients to use, ***ask@quilter.com***.

Wealth Management Consultants

Quilter has a team of field-based business consultants operating throughout the UK, and a team of online/telephone consultants. They deliver a high quality business consultancy service to advisers, and are responsible for articulating Quilter's proposition. They are focused on helping advisers identify opportunities within their businesses, and to help them to convert opportunities into positive outcomes for their clients.

Q *5.3 What technical support is accessible?*

A Instant access technical support

Our in-house technical team has worked hard to create articles, information and support for advisers on all areas of UK financial planning such as pensions, investments, taxation and trusts. Questions about the lifetime allowance, chargeable events and much more are all covered.

Access technical support articles online through your Platform Support Hub: ***quilter.com/support-hub/***

Pensions and investments specialists

To complement our online technical support, we have highly qualified and experienced individuals based across the UK. Our specialist team works with individual adviser firms to make the technically complex accessible, with practical advice ideas for you and your clients. Our specialists offer an extensive portfolio of support from a practical workshop approach to learning through case studies and questions.

Q *5.4 Do you offer support for financial advisers with gaining their professional qualifications?*

A Our Technical Specialists run training and seminars on topics such as key regulatory changes, tax year end masterclasses, tax training, and workshops.

They use a practical and participative approach and this can be used to evidence your learning for Continuing Professional Development (CPD) and FCA audit. In addition, they are on hand to help individual advisers with the application of that knowledge to clients, driving good customer outcomes.

Grow your business or train staff with the Quilter Financial Adviser School

The Quilter Financial Adviser School provides training programmes for people looking to start or progress their careers in financial advice. They can work in partnership with your firm, whether you're looking to develop an existing member of staff to become an adviser, need a new recruit for your firm or want your Level 4 qualified advisers to progress to Level 6.

As a trusted partner of The London Institute of Banking & Finance (LIBF), one of the top providers of professional and academic financial services qualifications, the school offers a completely unique and fully supported training programme, with the convenience of online in-depth tuition, unlimited access to a wealth of digital learning content and help and guidance after graduation.

Section 6

Functionality

Q *6.1 What functionality is available for new business and top-ups?*

A The following functionality is available to help you with placing new business:

- Produce a quote in under a minute with 'quick quote' functionality that can be easily converted to a full application
- Straight-through online processing, including confirming fee agreements online.
- Debit card payments processed online up to £99,999 for ISA, JISA, Collective Investment Account and Collective Investment Bond
- Electronic re-registration with participating providers through the TISA Exchange for the ISA, JISA, Collective Investment Account and Collective Retirement Account
- Pre-funding for new investments and pension tax relief
- Ability to hold cash
- Phased investment over 3, 6 or 12 months
- Configurable email alerts to notify you when a transaction has completed
- Client reporting tool with a client report that can be branded with your logo, showing the past performance of the fund(s) or model portfolio you are recommending to your client.

Q *6.2 Can you facilitate transfers between tax wrappers?*

A We offer a Bed & ISA facility between the Collective Investment Account and ISA and a Bed & Pension facility between the Collective Investment Account or ISA into the Collective Retirement Account.

Advisers can carry out Bed & ISA top-ups completely online. It replaces the need for a form, making moving money between the tax wrappers completely paper free.

For more information on the online Customer Centre, please see the answer to question 7.5.

Q *6.3 What functionality is available for fund selection and model portfolios?*

A The platform enables you to set up and maintain an unlimited number of model portfolios. You can use your own asset allocation or our optimised asset allocation models (devised with leading actuarial consultancy Willis Towers Watson).

Multiple client accounts can be linked to the portfolio and re-balanced back to the original investment percentages with a few clicks. This service represents an integral part of the robust online investment process that Quilter offers financial advisers and their clients.

Each portfolio can be made available to other members of the financial adviser firm to use.

We also offer the Client reporting tool so you can analyse individual funds, assets in clients' accounts, or model portfolios using historic performance. You can demonstrate the value of your advice by including or excluding the last fund switch on an account. A white-labelled client report is available.

Q *6.4 What functionality can help me analyse my clients' investments?*

A Client reporting is our investment analysis tool. This has been fully integrated into our technology platform. This allows you to run reports across a single portfolio, a single asset, one tax wrapper, or across all of your client's tax wrappers.

- A client's individual account on Quilter's platform
- Multiple accounts for one client on Quilter's platform
- Model portfolios
- Individual funds
- Time weighted return
- A clear summary of the charges and fees paid over the period that can be used alongside the MiFID II Costs and Charges report

Reports are available at all stages of the client's investment lifecycle, thereby creating continuity of advice from pre-sale, through to new business, and into the client review process. It can be used to research and evidence your recommendation that your client should invest or switch into a fund or portfolio of funds.

For account reviews, the tool will report on all of the historic holdings held in the account since inception, not just the current funds. You can choose to exclude the most recent switch from the report, or add in a fictional switch to show the performance had it taken place.

For reports on model portfolios, the switching history can be included or excluded in the performance charts, one or more transactions excluded, and fictional switches can be added at a date of your choice.

These extra features can really bring to life the value of your investment process and advice to your client.

The investment or portfolio can be benchmarked against one or more funds, a sector average or index to further evidence how it is performing. When choosing funds as a benchmark, you can use funds offered by Quilter or funds available externally.

Q 6.5 What functionality is available to help me to service my clients' accounts?

A The following functionality is available to help you with servicing your clients' accounts:

- Online illustrations and applications for new business and top-ups
- Portfolio planning tools – create an unlimited number of model portfolios with optional use of our optimised asset allocation models (devised with Willis Towers Watson)
- Link accounts to your model portfolios and rebalance all linked accounts in a few clicks
- Online switching and bulk switching by fund(s) or account(s), no requirement for us to see your client's signature
- Customisable activity tracking email alerts to notify you when the status of a transaction you have submitted has changed
- Automatic rebalancing of model portfolios monthly, quarterly, half-yearly or yearly, or when an asset breaches a percentage tolerance, which can be specified by you
- Bed & ISA functionality
- Online current and backdated valuations
- Transaction history
- Copies of client documents available online
- Online audit trail to help with your compliance needs
- Quarterly statements sent to your clients, with annual tax vouchers for the Collective Investment Account
- Data download function with a variety of reports, in Excel format
- Reporting Centre for WealthSelect – takes care of your regulatory reporting requirement when using this discretionary management service

Your clients can also view their Quilter accounts online through our online Customer Centre. More information is in the answer to question 7.5.

Q 6.6 What level of straight-through processing exists on the platform?

A Our platform offers online validation and self-certification, ensuring processes can be completed correctly first time. You can submit straight-through applications online, this can save you five days or more, gives you real-time feedback, and allows you to track progress online.

The following are some of the straight-through processes available:

- A quick and easy online Bed & ISA process
- Pension cash or Re-Reg transfer-in requests where the ceding scheme is Origo enabled
- Online one-off customer withdrawals of up to £75,000 for accounts held in a customer's sole name
- Add and update adviser fees - there's no need to send us the hard copy of the client's fee instruction. You just have to keep a copy on your file
- Set up and amend Direct Debit and regular withdrawal instructions
- An enhanced Expression of Wish, including cascading nominations, can be instructed online without sending us any paperwork
- Crystallise up to £300,000 (£75,000 tax free cash)
- We also accept online instructions for GAD reviews, merging flexi-access drawdown sub accounts, and moving from capped to flexi-access drawdown
- Validate a client's bank account.

Q 6.7 How easy is your website to use?

A Our platform adviser extranet has been researched, designed and tested with advisers and paraplanners to ensure it is easy to use. It is based on a 'client centric' model, meaning that you can easily find your client's record and service their account from one central page.

We have also made a range of improvements to our online Customer Centre that will make it easier for your clients to stay close to their investments. They will be able to access performance information, details of money paid in and out of their accounts, plus a transaction history. If your clients hold an ISA or Collective Investment Account they will be able to request one-off and regular withdrawals online, as well as topping up their accounts.

Q 6.8 What reporting is available?

A Current valuation statements can be generated on a single or consolidated account basis, and transaction history reports for variable dates can be produced. All reports are in a client-friendly format. Backdated valuations can be obtained online and a high-level breakdown of your clients' assets and holdings is available on the platform homepage.

A comprehensive suite of business reports is now available. Advisers will have easy and instant access to 27 tailored reports. This reporting will be available at a business, adviser and client level.

Capital Gains reports can be produced using our Capital Gains reporting tool for the Collective Investment Account (CIA). We have improved the user experience to make it more intuitive and with enhanced features. More details can be found in section 8.6.

If you and your clients are taking advantage of WealthSelect, you can use the reporting tool to send personalised quarterly performance reports to them quickly and easily – taking care of this regulatory requirement with minimum effort.

Q *6.9 How can you facilitate withdrawals and moving assets off the platform?*

A Here is a summary of the functionality we offer for withdrawals:

- Regular withdrawals from the ISA, CIA and CIB
- Withdrawals of distribution payments or 'natural income' for ISAs and Collective Investment Accounts
- Nine flexible ways to make withdrawals from the Collective Retirement Account
- Fund-specific encashment
- Telephone withdrawals for amounts under £75,000 for ISA and Collective Investment Account
- Electronic re-registration off-platform with participating providers on the TISA Exchange for ISA, JISA, Collective Investment Account and Collective Retirement Account. We are a member of the TISA Exchange for electronic re-registration and aim to process re-registration requests on the same day as receipt. The transaction usually takes around a week, although this is dependent on the fund group's processing timescales.
- Cash transfers out for ISA, JISA, Collective Investment Account and Collective Retirement Account
- Withdrawals up to £75,000 can be submitted through the Adviser Portal and through the online Customer Centre for ISAs and CIAs in one individual's name

Q *6.10 How long does it take to allocate or pay out the dividend distribution from funds?*

A If your clients want to receive natural income payments, you can easily select when the income distributions are paid.

Distributions can either be paid immediately, meaning your client will receive more frequent payments; or they can be rolled up into a single payment and paid regularly on a monthly, quarterly, half-yearly or yearly basis.

Q *6.11 Do you offer a gross nominee account?*

A For the ISA, JISA and Collective Retirement Account, distributions are received gross with no further personal liability to tax on them.

For the Collective Investment Bond, the life fund is subject to corporation tax so distributions are invested net into the bond.

For the unwrapped Collective Investment Account, all distributions are received gross. We issue tax vouchers to customers in May for the preceding tax year. This allows clients to disclose the income in their tax returns where appropriate.

Q *6.12 Do you pre-fund any transactions?*

A **Lump sums for new business and top-ups –** we pre-fund the purchase of units where we have received a payment but this is yet to clear in our bank account (i.e. cheques and BACS payments).

Pension tax relief – we add basic rate tax relief when applying personal contributions and reclaim it back from HMRC. This enables clients to benefit from up to an extra 45 days of potential investment growth.

Switching – where the switch is for a monetary amount, we place both the buy and sell trades on the same day. For switching, on a percentage basis, we process the sales on day 1 and pre-fund the sale trades on the following working day once we know what level of cash has been raised from the sale. We do not need to wait for settlement. All of our trading is facilitated electronically.

We do not pre-fund income withdrawals; we sell units for the value of the payment up to seven working days before the payment is due.

Q *6.13 What is your fund switching process?*

A Quilter pre-funds all switch transactions; we don't always need to wait for the sale trades to settle before placing the 'buy' trades.

The cut-off time for submitting switch instructions is 10:30am, and the dealing point for the majority of funds is midday.

The timing of the sale and purchase will depend on the type of switch instruction you have given. The diagrams below show timelines for two typical switch instructions.

A minority of funds have different cut-off and/or dealing points. These affect the length of time the switch will take to complete. There is a list of these on our website, ***quilter.com/investments/platform-funds/fund-research-and-information/dealing-points/***

Q *6.14 Do you offer integration links with back office software?*

A Back office software (BOS) enables financial advisers to efficiently manage their clients' accounts. Through a one-way automated link to a range of provider companies, it can receive up-to-date valuations to keep your records current. This can save you time, reduce costs and increase efficiency.

When you request a valuation on your BOS, an industry-standard message is sent to the platform, which then automatically returns the most recent valuation to the software. Depending on the capabilities of the software, valuations can be requested in bulk for all clients' accounts, and/or regular automatic updates scheduled.

Some BOS providers allow you to import electronic adviser remuneration statement data. This is called commission Electronic Data Interchange (EDI). We can offer this through our online platform where it is facilitated on the BOS – please speak to your software provider to find out if it is.

Quilter's platform integrates with the following BOS:

- 360 Lifescycle
- Adviser Cloud
- Assyst-Software
- Best Practice/Create
- Clever Adviser
- Contengo
- Dentons*
- Durell*
- Dynamic Planner
- Focus*
- IFAMS
- Intelliflo Ltd
- IRESS (Adviser Office and XPLAN)
- JCS
- Morningstar Wealthcraft (formerly Plum/Praemium)**
- Ningi*
- Plannr
- Plum Software Ltd/ Praemium/Wealthcraft
- Prestwood
- Sammedia/MoneyInfo
- Sprint - Fastrak/Finio
- Synaptic*
- Technology/Enable
- TIME4ADVICE/Curo
- Twenty7tec/Finplan
- TRUE POTENTIAL

**CashHub valuation are not currently supported.*
***Provided by Sprint Fastrak/Finio.*

In addition, Quilter's platform supports integration with ZeroKey, enabling advisers to transfer client data directly from a source system into the platform using the ZeroKey web extension. This reduces the need to manually re-enter information across multiple systems, helping to improve data accuracy, reduce administrative effort and streamline adviser workflows.

The ZeroKey integration is available at no additional cost and is designed to support firms using a range of commonly used back-office systems and adviser technology solutions.

To view more info regarding data and integration services, click ***here***.

For specific queries regarding particular back office systems and the services they offer, you should contact your back-office software provider directly.

Q *6.15 Can the platform record non-platform assets?*

A The capital gains tax tool available on Quilter's platform allows assets held outside Quilter investments to be included in calculations. Quilter's platform does not record non-platform assets.

Section 7

Accessibility

Q *7.1 What is the availability of your platform online services?*

A Every endeavour is made to ensure that our online platform is fully available during core business hours (8am to 8pm weekdays, UK time). It may not always be available outside these hours or on bank holidays due to overnight processing, maintenance and/or system updates. We aim to keep any downtime to an absolute minimum.

Q *7.2 What levels of access are available for your online services?*

A There are six levels of access to the Quilter's platform as shown in the table.

Role:	Master User	Delegated Customer Admin	Registered Customer with fees	Registered Customer without Fees	Read only	Portfolio Builder
Typical user with access to:	**Office Manager/ Business lead**	**Paraplanner or Administrator**	**Adviser**	**Adviser**	**Administrator**	**Investment Administrator**
Asset research, fund prices and performance	✓	✓	✓	✓	✓	✓
View asset holdings	✓	✓	✓	✓	✓	✓
WealthSelect Portfolio Explorer and reporting	✓	✓	✓	✓	✓	✓
Build & edit models	✓	✓	✓	✓	✓	✓
Switch models	✓	✓	✓	✓		✓
View and create clients	✓	✓	✓	✓	✓	
Create new business illustration	✓	✓	✓	✓	✓	
View client reports, valuations & transaction histories	✓	✓	✓	✓	✓	
View issued documents	✓	✓	✓	✓	✓	
Tools	✓	✓	✓	✓	✓	
View business MI	✓	✓	✓	✓		
Maintain client address and bank details	✓	✓	✓	✓		
Submit new business, top-ups, switches and withdrawals	✓	✓	✓	✓		
Maintain regular withdrawals & contributions	✓	✓	✓	✓		
Maintain LTA, update expression of wish	✓	✓	✓	✓		
Merge pension accounts	✓	✓	✓	✓		
Set up and maintain pension income	✓	✓	✓	✓		
View previously generated fee statements	✓	✓	✓			
Query and create breakdown of fees	✓	✓				
Access MI reports for the business	✓	✓				
Create and maintain other users within the firm	✓					
Transfer clients between advisers	✓					

Q *7.3 How will you notify me of times when the online service is not available?*

A We add a homepage news message to the website several days in advance of any time we need to take the website down for scheduled maintenance on weekends. This will appear each time you log in.

Q *7.4 What internet browsers are your online service compatible with?*

A Our platform adviser extranet is compatible with any internet browser and fully optimised for mobile phone and tablet.

Q *7.5 Can my clients get online access to the platform?*

A Your clients can register for access to our online Customer Centre, which allows them to:

- Instantly view all their accounts and investments in one convenient place, using their computer, tablet or mobile device
- Print valuation statements and account information, or save as a PDF document
- Request a one-off withdrawal up to £75,000 and regular withdrawals online for ISA and Collective Investment Accounts held in one individual's name
- Top up their CRA, ISA and CIA accounts, including Junior ISAs on which they are listed as guardian
- Access performance information, details of money paid in and out of their accounts, plus a transaction history
- Switch and redirect their fund choice*
- Choose to receive their account documentation online to reduce the amount of paperwork they get through the post.
- Access the Quilter customer mobile app, so all their Quilter platform investments are instantly available at their fingertips.

** Clients are prompted to speak to their financial adviser before carrying out a fund switch.*

Clients can register for the online Customer Centre on our website: ***customer.platform.quilter.com/en-gb/Customer/Login/***

Customers can download the Quilter app here: ***https://www.quilter.com/app/***

User guides are available for you to pass on to your clients:
How to register and login: ***quilter.com/siteassets/documents/platform/guides-and-brochures/10695-occ-user-guide.pdf***

Online Customer Centre user guide: ***quilter.com/siteassets/documents/platform/guides-and-brochures/21340-occ-user-guide.pdf***

Q *7.6 Can clients top up their accounts online?*

A We offer an additional service that is optional for all financial advisers, enabling your clients to top up their CRA, ISAs, any Junior ISAs on which they are listed as guardian and Collective Investment Accounts (CIAs) through the online Customer Centre.

It's a simple process and any top-ups will be invested into their current portfolio. Any existing servicing fee that you have previously set up on the account with the client's agreement will be applied to the top-up, and if you send us your company logo we'll add it to the webpages that your client will see, to enhance and extend your own service. Email and letter templates are available for you to personalise.

We'll automatically send you a confirmation email whenever one of your clients uses the service.

Customers can also top up their CashHub savings.

Q *7.7 What security measures are there for the online Customer Centre and Quilter customer app?*

A Similar to the security method used by many banks, when clients carry out certain transactions (such as if they forget their password), to check it's a genuine request we'll send them a code to enter into a box on the screen.

Clients will be asked for a code each time they carry out an activity which requires additional security checks, such as if they would like to update their email address. The codes are unique, so each time they carry out one of these activities they will receive a new code.

The Quilter app has in-built security features to give your clients peace of mind, whenever they access their accounts. This includes use of phone biometrics, automatic log out and end-to-end encryption.

Q *7.8 Do you facilitate execution-only business?*

A Quilter products are only available to new customers that have been introduced to us through a financial adviser. In some circumstances, where an existing customer's relationship with their adviser has broken down for example, we will allow execution-only top-ups. These are considered on an individual basis.

We strongly believe in the value of advice and will refer the client to our 'Find an adviser' page, available through our customer-facing website.

Section 8

Additional tools

Q *8.1 What is the full list of tools you have available?*

A We have a comprehensive suite of financial planning tools available to help you with both pre- and post-sale business, all available at no charge.

Investments:

Fund Centre (in partnership with Financial Express) – Provides fund information including performance, fund charges, volatility, ratings, plus costs and charges and target market information required by the European MiFID II regulations. You can also obtain fund factsheets and KID/KIID documents.

Client reporting tool – The Client reporting tool offers a flexible and personalised way to deliver detailed investment insights. Reports can be saved directly to the client's Document Library for easy access via the app or online Customer Centre. It provides granular performance data down to individual asset level, supports up to 10 sub-accounts and CashHub accounts, and allows customisable structures with flexible date ranges. Advisers can add branding, commentary, and digital signatures for a tailored experience. Benchmarking options include IA sector and CPI/RPI, with the ability to exclude benchmarks if preferred.

Portfolio planning tools – with optional use of our optimised asset allocation models (devised with Willis Towers Watson).

Risk assessment and discussion tools – A range of tools that help you to measure your clients' attitude to risk and build a suitable matching portfolio. The discussion tool assists you in the risk discussion process by explaining Quilter's ten risk levels.

Total cost of ownership tool – Calculates the impact of moving a client's existing Collective Retirement Account from our bundled charging structures to unbundled. It also shows you the impact of switching into different funds and swapping into the WealthSelect Managed Portfolio Service.

Pensions:

Carry forward calculator – Calculate the maximum gross contribution your clients or their employer can contribute to their pension by tax year end. The calculator takes into account any carry forward available and any taper to the Annual Allowance that applies.

Scheme specific tax-free cash calculator – Helps determine a member's tax-free cash entitlement where they had tax-free cash rights greater than 25% as at 5 April 2006.

Capped drawdown maximum income calculator – Use this calculator to identify the maximum income limits available under capped drawdown. The calculator is able to take account of additional designation calculations to existing drawdown funds. It can carry out target income calculations, identifying the amount to crystallise to provide a specific level of income.

Tapered Annual Allowance calculator – This stand-alone calculator will determine the level of tapered Annual Allowance applicable to the client. This can be used for any year. The results are based on the information provided, our current understanding of HMRC rules and does not account for any additional proposed contributions. If you wish to do a full calculation including maximum contributions and carry forward, please use our Maximum Contribution Calculator.

Taxation:

Chargeable Event Gain – Income Tax Calculator – Calculates the income tax payable, after available reliefs, for one or more chargeable event gains on a life or redemption policy. It can't be used where the gain is assessable on trustees, or where a company owns the investment, because life and redemption contracts owned by a company are taxed under the 'loan relationship' rules.

Capital Gains reporting tool – For the Collective Investment Account. Includes 'what if' disposal planning reports to maximise tax opportunities, add assets held outside of Quilter investments in calculations, fully tailor the report to your client's needs over a time period of your choice, and access the tool on any browser you choose.

Inheritance tax calculator – Lifetime Gift tool – Calculates a client's potential IHT liability. It also includes information on gifts, exemptions and suitable trusts.

Capital withdrawal financial planning tool – Calculates the capital gain on a given withdrawal from an investment or the amount of withdrawal required to utilise an individual's, or trustee's, capital gains tax allowance.

Chargeable Event Gain calculator – Calculates the chargeable events for part surrender of all policies, a full surrender of individual policies and full surrender of all policies within your client's bond.

Net Investment Returns Calculator – Shows the potential returns, after charges and tax, on 3 different investment products, Collective (or General) Investment Account, Offshore Investment Bond and Onshore Investment Bond, taking into account whether the individual is a basic, higher or additional rate tax payer.

Ongoing tax comparison tool – This financial planning calculator compares retaining an existing Collective (or General) Investment Account with closing the account and re-investing the proceeds in a Collective Investment (onshore) Bond.

Q *8.2 Can any of your tools be made bespoke to our requirements, or white labelled?*

A We cannot make our tools bespoke, but there is the opportunity to brand client reports with your company logo and digital signature, to enhance your client's experience of the service you offer.

Q *8.3 What are the key features of your Client reporting tool?*

Client reporting is a powerful interactive analytical tool for both pre- and post-sale business, which allows advisers to review the funds and performance data for the following:

- Valuations at the start and end of the reporting period
- Money in and out of your client's account, plus a money-weighted return measure
- Up to five years of transaction and performance data on each account
- The value of your client's account over time versus net payments
- Time-weighted returns
- The ability to add your own commentary to the report
- Summary of adviser fees, discretionary portfolio fees and Quilter charges during the reporting period.

Reports are available at all stages of the client's investment lifecycle, thereby creating continuity of advice from pre-sale, through to new business, and into the client review process. It can be used to research and evidence your recommendation that your client should invest or switch into a fund or portfolio of funds.

For account reviews, the tool will report on all of the historic holdings held in the account since inception, not just the current funds. You can choose to exclude the most recent switch from the report, or add in a fictional switch to show the performance had it taken place.

For reports on model portfolios, the switching history can be included or excluded in the performance charts, one or more transactions excluded, and fictional switches can be added at a date of your choice.

These extra features can really bring to life the value of your investment process and advice to your client.

The investment or portfolio can be benchmarked against one or more funds, a sector average or index to further evidence how it is performing. When choosing funds as a benchmark, you can use funds offered by Quilter or funds available externally.

Q *8.4 What are the key features of your risk profiling tool?*

A The risk profiler is provided by Quilter and hosted on our technology platform. It can be used by financial advisers to support a compliant sales process by quantifying the level of risk that their client is willing and able to accept for a particular investment. The client is asked a series of questions about his/her attitude to risk and a risk score between 1 and 10 is then determined based on the answers to these questions.

Each risk score is then directly related to an asset allocation in our portfolio planning tool which is optimised for tax, depending on internal tax and charges within each tax wrapper selected.

Our Risk Discussion tool, available on our website and as a mobile application (or 'app'), can further support the adviser with discussing the output from the risk profile questionnaire to ensure the client understands the risks they are taking through the proposed investment. It illustrates the annual 'expected returns' for the risk score that has been generated, and the average of all possible returns within that risk level. It can also be compared against an alternative risk level should the client not agree with the score provided from the answers given on the questionnaire.

Q *8.5 What are the key features of your portfolio planning tool?*

A The platform portfolio planning tool is provided and hosted by Quilter through its platform, and uses fund data provided by Financial Express (FE). The tool allows financial advisers to construct and maintain an unlimited number of investment portfolios, taking into account investor risk, the tax status of individual wrappers and the charges applying to different asset classes.

Portfolios can be constructed using either the adviser's own selected asset allocation, or Quilter's suggested optimised asset allocations for the growth or yield investor, which are developed and reviewed quarterly with the global financial consultancy, Willis Towers Watson.

Clients' accounts can be linked to the portfolios, and rebalancing of all linked accounts to the portfolio's original asset allocation can be carried out in a few minutes.

Q *8.6 What are the key features of your Capital Gains reporting tool?*

A Our new capital gains tax (CGT) reporting tool is now more user-friendly and gives you even more options when delivering valuable tax planning to your clients.

Five key improvements give you the ability to:

1. Carry out enhanced 'what if' scenario planning
2. Record and save book costs, gains or losses, and carried forward losses from the previous tax years
3. Include assets held outside of Quilter investments in calculations
4. Use the tool with all client types, including trusts, by specifying the appropriate CGT annual allowance
5. Fully tailor the report to your client's needs, over a time period of your choice, and access the tool on any browser you choose.

Scenario planning

With greater control over your clients' tax position, you can easily deliver sophisticated tax planning to help your clients achieve the best outcome.

Analysis can be carried out to assess your clients' current tax position, the impacts of a full or partial sale of assets, and there are a number of 'what if' scenarios that you can use, including:

– Selling proportionally across all funds

– Selling assets manually, by money or units

– Selling to reach a capital gain target

– Selling assets to reach a specific value.

Once produced, all CGT reports can be kept in your client records and will be saved for future use.

Q *8.7 Do you have recommended asset allocation models?*

A Yes. Advisers can choose to set up a portfolio of funds using the Quilter asset allocations that are linked to the appropriate risk score, through the platform's portfolio planning tool.

The Quilter asset allocator is designed to construct a portfolio with the highest mathematically-expected return for a given level of risk, based on the major asset classes. Optimising asset allocations for tax and charges within each tax wrapper is something that sets our portfolio planning tools apart from all other platforms in the market. They can also be optimised for the growth or yield investor.

The asset allocations are provided by Willis Towers Watson, a leading actuarial consultancy. They review the economic assumptions that underpin the asset allocations on a quarterly basis. If they recommend any changes these are communicated to all advisers in advance, with a rationale for the change included.

They are published on our website: ***quilter.com/investments/platform-funds/portfolio-construction/strategic-asset-allocations/latest-asset-allocation-quarterly-reviews/***

The asset allocations are very flexible. Unlike most other platform portfolio planning tools, we enable a financial adviser to limit exposure to a particular asset class by setting minimum and maximum percentages for each asset class. In such cases, the portfolio planning tool will automatically re-calibrate the asset allocation to maintain the same level of risk. This facility allows financial advisers to include certain bespoke elements within an asset allocation whilst still being able to demonstrate that they have followed a robust investment process.

All portfolios built using an asset allocation decided by the adviser will also be given a corresponding risk rating from 1-10. Portfolios of funds within a client account and individual funds are also given a risk rating.

Q *8.8 Are any of your platform tools outsourced?*

A Quilter uses both internal resource and external suppliers to manage, maintain and develop its platform solutions. We have partnered with platform technology provider, FNZ, to further develop our technology and build upon our strong foundations by introducing greater efficiencies and upgrading our customer and adviser offering.

Our risk profiler was developed with leading investment consultancy Willis Towers Watson (WTW), but is owned and updated by Quilter. Our asset allocations are updated quarterly on advice received by WTW.

Model portfolios set up on our platform can be imported into FE's Analytics.

Q *8.9 Do any of your platform tools recommend a specific investment with Quilter?*

A No. All of our financial planning tools are free from any fund or product bias. We recognise and respect that it is the responsibility of the adviser and their client to decide which investment is appropriate for their needs and achieve the best outcome.

Section 9

Terms and conditions

Q *9.1 What level of contact do you have with your regulators?*

A Quilter Investment Platform Limited is authorised and regulated by the FinancialConduct Authority (FCA) and Quilter Life & Pensions Limited is authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Quilter has pro-active engagement with the supervisory teams from both the FCA and PRA. This process involves members of our Executive Management team and Non-Executive Directors attending meetings with the PRA and FCA regularly throughout the year.

Quilter is subject to ad hoc thematic and formal regulatory reviews in accordance with the regulator's schedules. As Quilter is a fixed portfolio firm, we are frequently asked to contribute to the FCA's and PRA's information gathering and thematic work.

Q *9.2 What is your policy on Treating Customers Fairly (TCF)?*

A Our 'purpose' as a business is to enable positive futures for all our customers. Our business is nothing without customers and so it's crucial we put the customer at the heart of everything we do.

As a responsible business that means we work hard to ensure we offer products which meet customer needs and are fairly and transparently priced. It also means we must offer a standard of customer service which truly serves and distinguishes us from others. And finally it means we need to help customers understand their finances and make informed decisions by providing clear and simple information and promoting the value of financial advice.

We comply with the FCA's TCF principles and have embedded them into our culture and processes; from product design and marketing, to the point of sale, and servicing existing client accounts. We make it easy for you and your client to do business with us.

All employees are required to sit a computer-based training course on TCF annually and complete a test to ensure understanding of our TCF policies.

Q *9.3 How are you complying with the Consumer Duty?*

A Quilter's high-quality propositions are designed around the evolving needs of the customer, and benefit from continued investment in technology, investment propositions and financial adviser support.

We have developed a clear training approach to ensure all our employees understand their role in providing good customer outcomes and to ensure we embed a culture which is safe to speak up if it has been identified that good outcomes are not being achieved. This includes all staff training as well specific role-based training.

Furthermore, through partnership with a behavioural science consultancy, we've created a science-backed communications toolkit to help colleagues and advisers meet and exceed consumer understanding standards, with our commitment to always putting the customer first.

Like all financial services firms, Quilter is required to clearly explain who our products and services are suitable for, and the value that we provide to customers. Our assessment has ratified that Quilter's platform, products, and services provide good value to the target market and meet customers' reasonable expectations, including those with characteristics of vulnerability. You can view our Target Market and Fair Value Assessment here:

https://www.quilter.com/siteassets/documents/platform/guides-and-brochures/22767-deeper-dive-into-our-target-markets.pdf

Other support materials are available here: ***https://www.quilter.com/help-and-support/consumer-duty/***

Q *9.4 What is your formal complaints procedure?*

A Quilter's complaints procedure is focused on resolving customer related issues quickly and fairly. We accept complaints through any channel of communication.

If a resolution cannot be agreed with the customer (or their representative) by close of business on the third day following the day on which the complaint is received, it will be referred to the Complaints Team and acknowledged in writing by the end of the fifth working day. We aim to complete our investigations and to respond fully within four weeks.

Sometimes it may take longer for us to issue our response. Should this happen we will send a holding letter, which keeps the customer informed. Our response letter will include a summary of the complaint and our findings, along with details of any offer we are prepared to make to resolve a complaint.

For 'regulated' complaints the customer is also advised of their right to refer their complaint to the Financial Ombudsman Service if they are not satisfied with the outcome.

Root cause analysis is carried out on all complaints to improve our products and services in future.

We report the complaints received to the Financial Conduct Authority (FCA) according to their rules. ***www.fca.org.uk/data/complaints-data/firm-level***

Q *9.5 Do you have a best execution policy?*

A Our best execution policy states that we are required to put arrangements in place to enable us to deliver the best possible result for clients when dealing with orders, in accordance with COBS 11.2. When dealing in collective investment schemes other than Exchange Traded Instruments and Investment Trusts, we will carry out your clients' investment instructions by transmitting them to the operator of the fund or its agent for execution promptly using our automated trading systems.

At present we believe there is no other 'execution venue' available that could provide a better outcome for your clients in terms of price, cost, speed, likelihood of execution and settlement, or any other relevant matters.

Our order execution policy is provided in each of our product terms and conditions available to view online: ***quilter.com/documents/***

Q *9.6 What happens in the event of a fund suspension?*

A The account will remain invested in the fund but we can no longer buy or sell units in the affected fund while it's suspended. Full details are available on the document library via our website: ***quilter.com/documents/***

Q *9.7 How can you help me meet my compliance needs?*

A The platform gives financial advisers access to a robust and repeatable investment process through the risk profiling and portfolio planning tools provided. It also enables you to demonstrate suitability of advice, which can improve the regulatory robustness of your business. All actions carried out by the financial adviser through the platform are stored against the client and can be accessed through options such as transaction history and the document enquiry service. This applies to all tax wrappers.

Section 10

Summary

10.1 Summarise the key benefits to my clients of using your platform

- Our flexible products and award winning investment solutions[1] are suitable for clients with a wide range of needs, and can adapt as those needs change throughout their lives.
- Our charges are clear, competitive and easy for your clients to understand, with eligible family members benefiting from a lower combined charge through family linking.
- Our scale allows us to negotiate access to the most competitive fund prices in the market on their behalf.
- We pre-fund all lump sum new business, switches and tax relief on pensions so their money is invested in the market for as long as possible.
- Clients can securely view their Quilter investments and documents in one place in our online Customer Centre. Clients can easily activate their account by visiting ***customer.platform.quilter.com/en-gb/User/CustomerRegistration/***
- We are a strong and responsible business, providing consistently great service, tools and functionality that are built with clients' needs at heart.

[1]Defaqto 2025 Diamond Rating – 5 Diamond Rating for WealthSelect Managed Active Portfolios and for WealthSelect Managed Blend Portfolios

10.2 Summarise the key benefits to my business of using your platform

Quilter's platform has been developed to provide advisers with wider choice, greater convenience and more control. Being user-friendly is in our DNA and we strive to make advisers' activities quicker, easier, and harness technology to make things smarter.

Quilter's platform has the strength and capability to support client needs both today and into the future by giving you:

- Intelligent options for investment management that give you more choice over how you run your clients' investments
- Online processes saving you time and money
- Data-rich, time-saving reports bringing you more clarity and understanding of your clients' investments
- Even more flexibility from a market leading pension
- Refreshingly straightforward cash management with the convenience of running cash at product level
- Flexible model portfolios you can easily control, helping you to be clear on where your clients are invested
- Seamless access to discretionary services allowing you to tailor your client offering

This is underpinned by an award-winning service to both advisers and customers, clear and simple charges with extensive family linking, and some of the most competitive fund deals in the market.

Thank you for considering Quilter.

If you have any further questions that are not answered by this document, please speak to your consultant or email ***DueDiligenceQuestion@quilter.com***

The value of your clients' investments may fall as well as rise and they may not get back what they put in.

quilter.com

This communication is issued by Quilter, a trading name of Quilter Investment Platform Limited, who provides an Individual Savings Account (ISA), Junior ISA (JISA), and Collective Investment Account (CIA), and Quilter Life & Pensions Limited, who provides a Collective Retirement Account (CRA) and Collective Investment Bond (CIB).

Quilter Investment Platform Limited and Quilter Life & Pensions Limited are registered in England and Wales under numbers 01680071 and 04163431, respectively.

Registered office at Senator House, 85 Queen Victoria Street, London, EC4V 4AB.

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Registered office at 2nd Floor, 4 Pentonville Road, Angel, London, N1 9HF. Bondsmith is authorised and regulated by the Financial Conduct Authority.

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