

## Target market and assessment of value information for Quilter's platform

*This document is designed to be retained as part of your compliance due diligence requirements. It outlines the methodology behind, and results, of:*

- Quilter's target market segments
- Our Consumer Duty Assessment of Value for the Quilter platform.



# Helping you comply with Consumer Duty requirements

The FCA's Consumer Duty rules require firms like Quilter to:

1. **define target markets** more clearly for their products and services, and
2. **assess the value** of those propositions considering the needs of the customer groups and taking vulnerable characteristics into account.

## The regulations state that:

- ✓ firms must identify target markets at a sufficiently granular level, considering the characteristics, risk profile and nature of the product or service.
- ✓ target market information should cover all relevant groups of customers, including those with characteristics of vulnerability, considering the overall product or service and what is expected of consumers' ability to understand it.
- ✓ the product/service should not adversely affect groups of customers in the target market or cause foreseeable harm. It should meet identified needs, based on real customer needs, characteristics, and objectives.

## What do we provide to help you meet the regulations?

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. As an adviser, it's important that your advice and recommendations reflect this value.

It is your responsibility to complete your due diligence, to help you, we have produced all the governance information you'll need about Quilter for your regulatory needs, covering both Consumer Duty and other regulations, such as MiFID II, that are now in the FCA's rulebook.

This document will help you demonstrate the suitability of Quilter's products to specific customer segments, and help you assess the value you are providing to your clients by recommending a Quilter product.

## Contents:

### 1. Target market - overview

Designing our products and services 4

Why we use a segmentation model and the benefits for advisers 5

### 2. Assessment of value – high-level results

Assessment of value summary - how we measure up 7

### 3. Full methodology and results – target market segmentation

Understanding the needs of our customers within each segment 10

**Results of target market segmentation including customers' needs: 11**

Starting savings journey 11

Growing wealth 12

Approaching/at retirement 12

In retirement/decumulation 13

**Target market statements for product wrappers: 14**

Stocks and Shares ISA & Junior ISA Target Market 14

Collective Investment Account (CIA) Target Market 15

Collective Retirement Account (CRA) Target Market 16

Collective Investment Bond (CIB) Target Market 17

### 4. Full methodology and results – assessment of value

What does the FCA require firms to do when assessing value? 20

How we assess our value 20

**Results of our assessment of value: 23**

The platform and all products/wrappers 23

Stocks and Shares ISA & Junior ISA 25

Collective Investment Account (CIA) 25

Collective Retirement Account (CRA) 26

Collective Investment Bond (CIB) 27

## Section 1

### Target market – overview

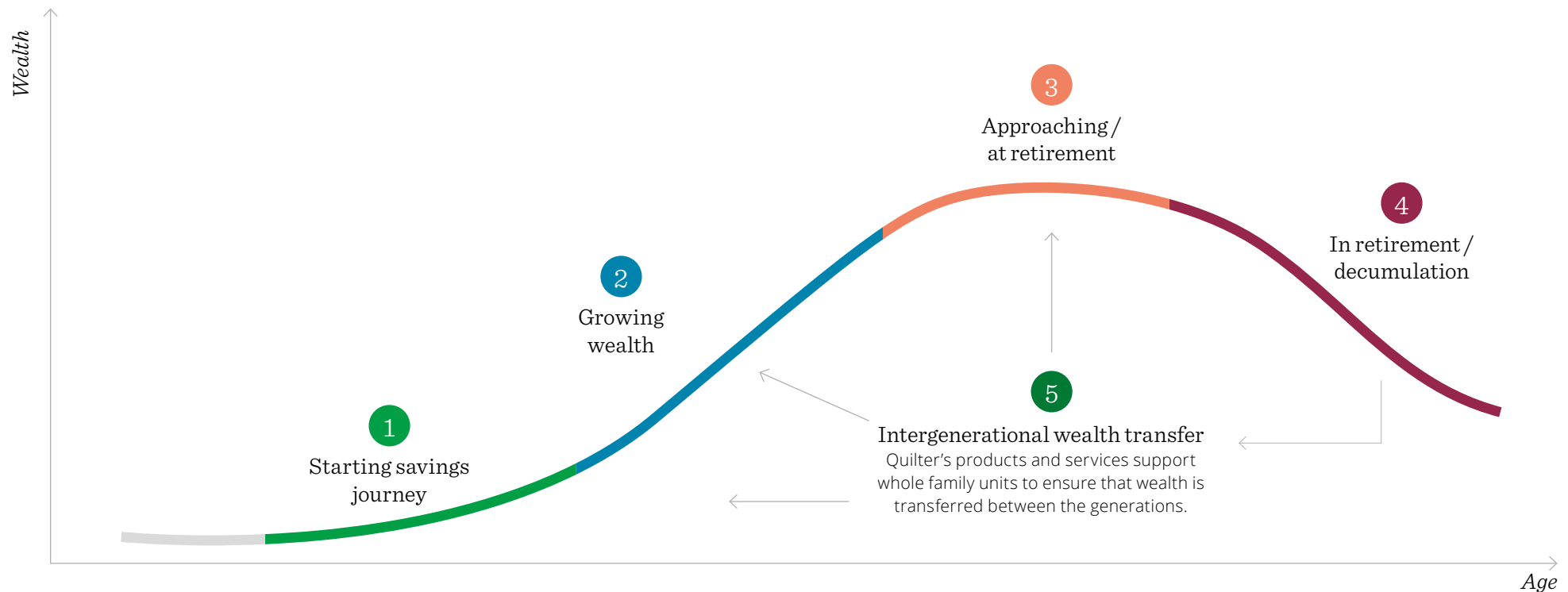


*As a platform, we are committed to working with advisers and offering products and services that deliver good outcomes for your clients. This section explains how we identify the needs of our customers and design our products and services to best meet these needs.*

## Designing our products and services

An investment platform can be used by a wide range of customers. To ensure our propositions support our customers through their lifecycle as their needs change, we group general investors into five different segments depending on their life stage, as shown in the diagram below.

To meet these needs, our range of product wrappers are designed to adapt and evolve with our customers as their circumstances change. Our range of wrappers support customers throughout their life, with the ability to combine our platform's service through its different features and functionality in different ways to deliver value to each of our customer segments.



## Why we use a segmentation model and the benefits for advisers

### By using a segmentation model we are able to:

- ✓ distinguish and determine the different and ever-changing needs of our target customers
- ✓ design our current and future propositions to meet these needs over time
- ✓ understand the characteristics of vulnerability that might appear in our target market and ensure we meet the needs of vulnerable customers
- ✓ ensure that each customer segment receives good value and is well supported
- ✓ identify any areas for improvement as part of ongoing product reviews and value assessments

### By recommending a platform with a clear segmentation model you can:

- ✓ demonstrate the value of your advice by recommending a platform that is suitable now and in the future for your clients
- ✓ needs avoid causing foreseeable harm by recommending a platform that will flex as your clients' needs change over time
- ✓ have the confidence that your clients will be supported if they encounter particular vulnerabilities
- ✓ spend less time on administration and more time on your client relationships and delivering and evidencing the value of your advice service
- ✓ have a choice of product wrappers which can be used at different stages of a client's life across all case size and risk profiles



You can find our detailed target market information, broken down by customer segment and by product, on page 10.

## Section 2

Assessment of value –  
high-level results



*We are committed to ensuring that advisers have distribution arrangements that are consistent with providing fair value. To do this, we have made sure that you have everything you need to understand:*

- ✓ our target market
- ✓ the needs of our target market and how we meet those needs
- ✓ the features and benefits of our platform and wrappers and how they provide value
- ✓ the outcome of our value assessment
- ✓ the negative target market and any limitations of our products and services
- ✓ the types of vulnerabilities that might exist in our target market
- ✓ how we identify and supports customers in vulnerable situations to ensure they continue to receive fair value

We are responsible for assessing whether our products and services provide fair value. We complete our value assessment during Q1 each year and keep this up to date through a regular product review framework.

### Assessment of value summary - how we measure up

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.

Segment	JISA	ISA	CIA	CRA	CIB
Starting savings journey	Y	Y	Y	Y	Y
Growing wealth		Y	Y	Y	Y
Approaching /at retirement		Y	Y	Y	Y
In retirement/decumulation		Y	Y	Y	Y

\*CashHub, powered by Bondsmith, is not a Quilter manufactured product and hence Bondsmith are responsible for providing the value assessment. We have reviewed this as distributor and are satisfied CashHub provides value for its customers

As well as being fairly priced, Quilter's platform offers significant features that are not available on many competitor platforms:

- ▶ our market leading multi-member family discount, Family Linking
- ▶ effortless cash management that does the hard work for you
- ▶ smart trading that reduces clients' time out of the market
- ▶ flexi-ISA functionality that makes withdrawing from and topping up an ISA easy
- ▶ an award-winning pension, that benefits from pre-funding of tax-relief and nine ways to take income
- ▶ our unique on-platform onshore bond
- ▶ the widest trust range on the market, meeting a wide range of clients' needs for access, flexibility and IHT efficiency
- ▶ online services that make you more efficient with straight-through processing built in
- ▶ a wide suite of adviser tools and MI
- ▶ the convenience of CashHub to manage client cash savings alongside their other Quilter investments



You can read more about the full methodology behind our assessment of value and how we reached this result on page 10.



## Section 3

Full methodology and results –  
target market segmentation



*Quilter's platform already had an established target market which we have evolved in line with Consumer Duty to understand UK consumers' financial behaviour, characteristics, needs and potential vulnerabilities. These revised target market definitions have been used in assessing value.*

## Understanding the needs of our customers within each segment

### 1. Independent data

To better understand our customers, we use data from independent third-party research specialists\* which provides insights into customers' financial behaviour, characteristics, needs, and potential vulnerabilities. This data\*\* provides a view of UK consumer financial behaviour, placing every household in the UK into one of 55 different 'types', which are then nested into 15 groups.

### 2. Applying the data to our customer segments

We have used independent third-party\* software to map our target market customer segments to their groups and types. This helps us identify the characteristics of those consumers which our services are designed for and mapped the relevant groups to our five customer segments.

These five segments are key to Quilter based on typical independent third party financial and behavioural profiles and the number of customers in these groups.

The following diagram shows how these relevant segments from the independent third-party research specialists\* align with the Quilter segments.

Quilter target market segments	Starting savings journey	Growing wealth	Approaching/at retirement	In retirement/decumulation		
	<b>Intergenerational Wealth</b> Passing wealth on to the next generations, many looking to help their children (e.g. support buying first home)					
Groups identified by independent third-party research specialists*	<b>C: Growth Phase</b> - households with good incomes but high costs, focusing on progressing careers and establishing families.	<b>B: Money Makers</b> - high income households who are in the process of accruing assets, despite high expenditure, to give financial security.	<b>G: Career Experience</b> - confident older owners in comfortable homes with above average incomes that reflect their responsibility and experience.	<b>F: Established Investors</b> - wealthy households who have accumulated substantial assets and are confident in financial management.	<b>K: Respectable Reserves</b> - older couples and singles whose home ownership and savings will give them a margin of comfort in their post-working life.	<b>M: Golden Age</b> - fortunate elders on gold-standard pensions with money to enjoy now and choices in the future.

### 3. Identifying vulnerabilities within each segment

The tool we use from the independent third-party research specialists\* provides data which we use to assess the likelihood of a wide range of vulnerabilities affecting our different customer groups. We use this in our vulnerable customer standards, training material, and customer-facing content, demonstrating a clear link between the support model we operate and the needs of our target market.

\* Currently Experian

\*\* Experian Financial Strategy Segments (FSS4) model

## Results of target market segmentation including customers' needs

The following tables show:

- ▶ Quilter's target market segments,
- ▶ the potential needs and characteristics of those segments, and
- ▶ example platform features and functionality typically used by those segments.

### Summary of target market segments and customer needs

Quilter Target Market	Starting savings journey	Growing wealth	Approaching/at retirement	In retirement/decumulation
	<b>Intergenerational Wealth</b> Passing wealth on to the next generations, many looking to help their children (e.g. support buying first home)			
<b>Typical Client Needs</b>	Shorter-term saving goals aimed predominantly at buying first property Long-term saving typically a workplace pension Digital preference with quick/easy user-experience	Varied short to medium term investment goals e.g. upgrading house, saving for children (education) More likely to consider pension consolidation as likely to have worked at multiple employers	Focus on maximising wealth for retirement Many looking for support in deciding how to set up their finances for retirement	Focus is on ensuring retirement plans remain appropriate to fund lifestyles Market volatility could drive need for advice to help manage

Our core Target Market is advised customers, who are recommended products following an advice suitability process and so can assume that as advisers monitor ongoing suitability, advised customers remain within Target Market.

Advised customers who become non-advised might then be considered outside of Target Market. However we support these customers such as testing our communications for understanding by retail non-advised customers and, where appropriate, we suggest seeking the services of an adviser.

We monitor this cohorts' outcomes in our day-to-day activities – feedback, complaints, contacts and demographics to ensure fair outcomes will apply.

### Starting savings journey

Sub section	Typical characteristics	Typical wrappers	Platform features & functionality	Platform investment solutions	Potential vulnerable characteristics
<b>Basic investor</b>	Career starters Young family Multiple, sometimes conflicting objectives Limited funds Saving for first home Limited financial services knowledge Under 45 years old	CIA (+ designated accounts for young clients) JISA ISA	Regular savings 3rd party contributions Bare trusts Transfers Phased investment Rebalancing	Multi-Asset funds Adviser Model Portfolios 3rd-Party MPS WealthSelect	Bereaved Job loss Low income or debt Low literacy or numeracy skills Mental health Non-advised
<b>Young professionals</b>	Likely to have a steep career trajectory. May be income rich but asset poor – but may receive large bonuses May not have extensive knowledge of Financial Services. Under 45 years old	CRA (including for Under 18s) CIB	Adviser charging Receipt of beneficiary drawdown Family linking		Victim of a crime or financial crime Financial inexperience Divorce

## Growing wealth

Sub section	Typical characteristics	Typical wrappers	Platform features & functionality	Platform investment solutions	Potential vulnerable characteristics
<b>Simple needs</b>	Approaching Retirement (for example aged 45 to 65)	CIA ISA CRA CIB	Regular savings 3rd party contributions Cross-wrapper transfers Transfers Withdrawal and regular income options Rebalancing Adviser charging Family linking	Over 2,600 funds 800 ETIs 140 DIMs Adviser Model Portfolios WealthSelect Multi-asset funds	Bereaved Low literacy or numeracy skills Mental health Non-advised Power of Attorney Victim of a crime or financial crime Job loss Financial inexperience Divorce/separation
<b>Complex needs</b>	Approaching Retirement (for example aged 45 to 65) Likely to have built up significant wealth outside of Pensions More complex tax planning needs such as income LTA and IHT				

## Approaching/at retirement

Sub section	Typical characteristics	Typical wrappers	Platform features & functionality	Platform investment solutions	Potential vulnerable characteristics
<b>Simple needs</b>	Less than 5 years until retirement Age 55 Plus Funding retirement mainly from Pension savings	CRA CIA ISA CIB	Adviser charging 3rd party contributions Cross-wrapper transfers Transfers Withdrawal and regular income options Rebalancing Family linking	Over 2,600 funds 800 ETIs 14 DIMs Adviser Model Portfolios WealthSelect Multi-asset funds	Bereaved Low literacy or numeracy skills Mental health Non-advised Power of Attorney Victim of a crime or financial crime Financial inexperience
<b>Complex needs</b>	Less than 5 years until retirement Age 55 Plus Funding retirement from multiple sources Wealth exceeds retirement income needs - scope for further planning and intergenerational transfer May be in receipt of Inheritance or needing to manage parents' estate for long term care				

## In retirement/decumulation

Sub section	Typical characteristics	Typical wrappers	Platform features & functionality	Platform investment solutions	Potential vulnerable characteristics
<b>Simple needs</b>	<ul style="list-style-type: none"> <li>▶ In Retirement</li> <li>▶ Age 55 or older</li> <li>▶ Funding retirement income from pensions Occ/Private/State</li> <li>▶ Small amount of other Investments</li> </ul>				
<b>Complex needs</b>	<ul style="list-style-type: none"> <li>▶ In Retirement</li> <li>▶ Age 55 Plus</li> <li>▶ Funding retirement from several sources</li> <li>▶ Greater amount of wealth and multiple objectives including intergenerational planning.</li> <li>▶ In Retirement</li> <li>▶ Age 70 Plus</li> <li>▶ In receipt of state Pension</li> <li>▶ Potential future Long term care needs</li> <li>▶ Potential POA</li> </ul>	<ul style="list-style-type: none"> <li>▶ CIA</li> <li>▶ CIB</li> <li>▶ ISA</li> <li>▶ CRA</li> </ul>	<ul style="list-style-type: none"> <li>▶ Trust suite</li> <li>▶ Family linking</li> <li>▶ Withdrawal and regular income options</li> <li>▶ Retirement income options</li> </ul>	<ul style="list-style-type: none"> <li>Over 2,600 funds</li> <li>800 ETIs</li> <li>140 DIMs</li> <li>Adviser Model Portfolios</li> <li>WealthSelect</li> <li>Multi-asset funds</li> </ul>	<ul style="list-style-type: none"> <li>Armed forces or Ex-Pats</li> <li>Bereaved</li> <li>Carers</li> <li>Disengaged</li> <li>Divorced</li> <li>Hearing impaired</li> <li>Diagnosis of illness</li> <li>Mental health</li> <li>Non-advised</li> <li>Power of Attorney</li> <li>Victim of a crime or financial crime</li> </ul>
<b>Complex needs - Active years</b>	<ul style="list-style-type: none"> <li>▶ In Retirement</li> <li>▶ Age 70 or older</li> <li>▶ In receipt of state Pension</li> <li>▶ Potential future Long term care needs</li> <li>▶ Potential POA</li> </ul>				
<b>Complex needs - Passive years</b>	<ul style="list-style-type: none"> <li>▶ In Retirement</li> <li>▶ Age 70 or older</li> <li>▶ In receipt of state Pension</li> <li>▶ Potential future Long term care needs</li> <li>▶ Wealth preservation</li> </ul>				

## Target market statements for product wrappers:

Below you'll find our target market statements for each of our products along with the types of clients' needs these products are suitable for.

### Stocks and Shares ISA & Junior ISA Target Market

<b>Knowledge and Experience</b>	Suitable for clients with basic financial knowledge through to experienced investors.
<b>Ability to bear loss</b>	Suitable for clients who are willing to take some investment risk and have capacity to accept a capital loss, as assessed by their adviser. This product offers no capital guarantees.
<b>Clients Objectives &amp; Needs</b>	<p>The Account is suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ want to invest tax-efficiently over the medium- to long-term, in unit trusts, open-ended investment companies (OEICs), exchange traded funds (ETFs), exchange traded commodities (ETCs) or investment trusts, with the aim of achieving growth, bearing in mind that this is not guaranteed</li> <li>▶ are a UK resident, aged 18 or over for the ISA, or the child is under 18 for the Junior ISA</li> <li>▶ are happy to accept more risk to their capital than saving in a cash ISA through a bank or building society</li> <li>▶ want a flexible ISA</li> <li>▶ want to transfer in ISA investments from another provider or have not already invested in Stocks &amp; Share ISA with another provider in the same tax year</li> <li>▶ want to use their ISA online, by phone or by post</li> </ul>
<b>Minimum Recommended Holding Period</b>	▶ Suitable for clients who normally intend to invest for at least 5 years
<b>Distribution Strategy</b>	▶ The Account is marketed to Financial Advisers who use the Quilter platform
<b>Negative target market</b>	<p>This Account service is not suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ have no other savings</li> <li>▶ are not happy to accept the risk of potential investment losses, with no guarantee of their money growing</li> <li>▶ there is a need to withdraw money before the age of 18 (only relevant to the Junior ISA)</li> <li>▶ would like, as a parent or guardian, to retain control of money invested in a Junior ISA after the child has reached age 18</li> <li>▶ want to invest full allowance in a Cash ISA, Lifetime ISA or an Innovative Finance ISA instead</li> <li>▶ wish to have predominantly cash holdings for long periods</li> <li>▶ wish to trade ETFs/ETCs and Investment Trusts frequently despite having a low fund value</li> </ul>

## Collective Investment Account Target Market

<b>Knowledge and Experience</b>	Suitable for clients with basic financial knowledge through to experienced investors.
<b>Ability to bear loss</b>	Suitable for clients who are willing to take some investment risk and have capacity to accept a capital loss, as assessed by their adviser. This product offers no capital guarantees.
<b>Clients Objectives &amp; Needs</b>	<p>The Account is suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ want to invest (individually or jointly) over the medium- to long-term, with the aim of achieving growth, subject to relevant taxes, bearing in mind that growth is not guaranteed</li> <li>▶ have already used up their ISA allowance for this tax year and/or have a large amount of money to invest</li> <li>▶ are resident in the UK, Isle of Man, Guernsey or Jersey and are either an individual aged between 18 and 95, a company, trust or a pension scheme</li> <li>▶ are happy to accept more risk than saving in a bank or building society account</li> <li>▶ already hold investments on our platform and intend to make future payments, when allowances permit, using the CIA as a convenient way to accumulate and facilitate such payments.</li> </ul>
<b>Minimum Recommended Holding Period</b>	▶ Suitable for clients who normally intend to invest for at least 5 years.
<b>Distribution Strategy</b>	▶ The Account is marketed to Financial Advisers who use the Quilter platform
<b>Negative target market</b>	<p>This service is not suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ have no other savings</li> <li>▶ are not happy to accept the risk of potential investment losses, with no guarantee of their money growing</li> <li>▶ want unrestricted access to their money before the age of 55</li> <li>▶ want to set up a workplace pension arrangement, since the Collective Retirement Account cannot be used as an auto-enrolment or qualifying workplace pension scheme</li> <li>▶ are currently in a final salary (also known as defined benefit) pension scheme and are looking to transfer out of that scheme, but who need a guaranteed income for life, potentially with inflation protection or similar benefits</li> <li>▶ wish to have predominantly cash holdings for long periods</li> <li>▶ wish to trade ETFs/ETCs and Investment Trusts frequently despite having a low fund value</li> <li>▶ wish to open an account on an execution only/non-advised basis</li> </ul>

## Collective Retirement Account Target Market

<b>Knowledge and Experience</b>	Suitable for clients with basic financial knowledge through to experienced investors.
<b>Ability to bear loss</b>	Suitable for clients who are willing to take some investment risk and have capacity to accept a capital loss, as assessed by their adviser. This product offers no capital guarantees.
<b>Clients Objectives &amp; Needs</b>	<p>The Account is suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ want to individually invest over the medium- to long-term, with the aim of achieving growth, subject to relevant taxes, bearing in mind that growth is not guaranteed</li> <li>▶ are looking to build up their pension savings to provide an income in the future by investing for potential growth, bearing in mind that their money is not guaranteed to grow</li> <li>▶ want the flexibility to make their own choice of investment assets in line with their aims and attitude to risk</li> <li>▶ are prepared to have their money tied up, normally until at least age 55 (rising to age 57 from 6 April 2028), but then have choice over how and when to take their benefits</li> <li>▶ would like the rest of their savings to remain invested for potential growth when they begin to take income withdrawals, and any lump sums, bearing in mind that their money is not guaranteed to grow</li> <li>▶ want to provide benefits for their beneficiaries on death</li> <li>▶ want the convenience and flexibility of being able to consolidate and manage all their pension savings within the CRA by transferring pension savings they have built up in other schemes into it, including any 'defined benefit' transfers that have been assessed and approved as being in their best interests by a financial adviser who is a regulated pension transfer specialist</li> <li>▶ want the freedom to transfer their pension savings in this account to another authorised provider, for example if they want to buy an annuity (a guaranteed income for life), to move their pension savings abroad, or to take advantage of benefits not offered by this account</li> </ul>
<b>Minimum Recommended Holding Period</b>	▶ Suitable for clients who normally intend to invest for at least 5 years
<b>Distribution Strategy</b>	▶ The Account is marketed to Financial Advisers who use the Quilter platform
<b>Negative target market</b>	<p>This service is not suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ have no other savings</li> <li>▶ are not happy to accept the risk of potential investment losses, with no guarantee of their money growing</li> <li>▶ want unrestricted access to their money before the age of 55</li> <li>▶ want to set up a workplace pension arrangement, since the Collective Retirement Account cannot be used as an auto-enrolment or qualifying workplace pension scheme</li> <li>▶ are currently in a final salary (also known as defined benefit) pension scheme and are looking to transfer out of that scheme, but who need a guaranteed income for life, potentially with inflation protection or similar benefits</li> <li>▶ wish to have predominantly cash holdings for long periods</li> <li>▶ wish to trade ETFs/ETCs and Investment Trusts frequently despite having a low fund value</li> <li>▶ wish to open an account on an execution only/non-advised basis</li> </ul>



## Collective Investment Bond (CIB) Target Market

<b>Knowledge and Experience</b>	Suitable for clients with basic financial knowledge through to experienced investors.
<b>Ability to bear loss</b>	Suitable for clients who are willing to take some investment risk and have capacity to accept a capital loss, as assessed by their adviser. This product offers no capital guarantees.
<b>Clients Objectives &amp; Needs</b>	<p>The Bond is suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ want to invest, individually or jointly, a minimum of £10,000 over the medium- to long-term, with the aim of achieving growth, subject to relevant taxes, bearing in mind that growth is not guaranteed</li> <li>▶ are either a UK resident individual aged between 18 and at least one life assured who is under the age of 85, or a company or trust</li> <li>▶ are using the bond as part of their tax planning either because they have used up their other allowances or as part of inheritance tax planning</li> <li>▶ want the option of taking regular withdrawals potentially using tax deferral</li> <li>▶ want the option of protecting their capital using the 'Capital Protected Death Benefit.</li> </ul>
<b>Minimum Recommended Holding Period</b>	<ul style="list-style-type: none"> <li>▶ Suitable for clients who normally intend to invest for at least 5 years</li> </ul>
<b>Distribution Strategy</b>	<ul style="list-style-type: none"> <li>▶ The Bond is marketed to Financial Advisers who use the Quilter platform</li> </ul>
<b>Negative target market</b>	<p>The Bond is not suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ have no other savings or investments</li> <li>▶ have not used other available tax allowances, such as an ISA</li> <li>▶ need access to their capital in the short term</li> <li>▶ are not willing and able to accept the risk of potential investment losses, with no guarantee of growth.</li> <li>▶ wish to have predominantly cash holdings for long periods</li> <li>▶ wish to invest in ETFs/ETCs and Investment Trusts</li> <li>▶ wish to open an account on an execution only/non-advised basis</li> <li>▶ are non-taxpayers</li> </ul>

## CashHub Target Market

CashHub, Powered by Bondsmith is an online savings marketplace that is distributed, not manufactured, through Quilter. It offers a choice of savings accounts from a regularly reviewed panel of banks and building societies and a Value Assessment is produced by Bondsmith and approved by Quilter.

<b>Knowledge and Experience</b>	Suitable for clients with basic financial knowledge through to experienced investors.
<b>Ability to bear loss</b>	Suitable for clients who are not willing to take investment risk and have no capacity to accept a capital loss.
<b>Clients Objectives &amp; Needs</b>	<p>The Account is suitable for clients who:</p> <ul style="list-style-type: none"> <li>▶ are UK resident (non-US citizens) and are aged 18 or over</li> <li>▶ do not need a child or corporate/charity/institution account</li> <li>▶ have uninvested savings held outside of any tax wrappers</li> <li>▶ may have no allowances left in their Quilter platform tax wrappers</li> <li>▶ want the convenience of managing their uninvested cash alongside their other Quilter investments</li> <li>▶ want to hold any level of cash for shorter periods than would be suitable for higher risk investments</li> <li>▶ are willing to not withdraw cash when invested in a fixed-term or notice account</li> <li>▶ are happy to deal with tax on the gross interest paid via their tax return</li> </ul>
<b>Minimum Recommended Holding Period</b>	None, other than minimum terms of any notice or fixed term accounts.
<b>Distribution Strategy</b>	The Account is available to any customer who uses the Quilter platform.
<b>Negative Target Market</b>	<p>The CashHub might not be suitable for customers who:</p> <ul style="list-style-type: none"> <li>▶ have unused tax allowances</li> <li>▶ are willing to take investment risk to grow their savings over time</li> <li>▶ live overseas</li> <li>▶ are not a UK resident for tax purposes</li> <li>▶ want a child account</li> <li>▶ want an institutional/corporate account</li> </ul>

## Section 4

Full methodology and results –  
assessment of value



## What does the FCA require firms to do when assessing value?

To determine whether customers are receiving fair value, firms must assess their products and services to ensure there is a reasonable relationship between the price paid and the overall benefit a customer receives. If a product or service does not meet the needs of customers, or there is no obvious benefit from it, then it is not fair value.

Fair value is about more than just 'price and charges' - firms must assess all their products and services to ensure there is a reasonable relationship between the price paid and the overall benefit a customer has received, and will receive, from it over a product's lifetime.

Value can be assessed by conducting customer research, testing, or using internal data to assess fair value. The FCA does not expect firms to quantify non-monetary costs and benefits, but they do at least expect these features to be assessed qualitatively.

## How we assess our value

At its heart, the Consumer Duty is structured around a single core principle: "A firm must act to deliver good outcomes for retail customers." This is underpinned by three cross-cutting rules, strengthening existing standards to reflect what is expected. There are then four specific outcomes, with detailed requirements for consumer support, communications and assessing products and their value.

<b>Consumer Principle</b>	A firm must act to deliver good outcomes for retail customers.
<b>Cross-Cutting Rules</b>	Firms must: <ul style="list-style-type: none"> <li>▶ act in good faith toward retail customers</li> <li>▶ avoid foreseeable harm to retail customers</li> <li>▶ enable and support retail customers to pursue their financial objectives</li> </ul>
<b>Four Outcomes</b>	<ol style="list-style-type: none"> <li>1. Products and services</li> <li>2. Price and value</li> <li>3. Consumer understanding</li> <li>4. Consumer support</li> </ol>

Our platform maps the four outcomes to the seven pillars that we use to assess value for our customers and encompasses the combined results across all these pillars. These pillars seven correspond closely with the FCA's areas of focus for advisers to assess platform suitability

Consumer Duty Outcome		Our Due Diligence Pillar Mapping
<b>Product &amp; Service</b>	We ensure that our products and services are designed and supported to meet the needs of the customer including those with vulnerabilities. Customers use the products in the way that is intended, receive the necessary support and avoid foreseeable harm throughout the lifetime of the product.	<b>Platform strength &amp; service Fund range &amp; asset classes Wrapper range Governance</b>
<b>Price &amp; Value</b>	We check that the amount customers pay represent fair value for the benefits they receive and correspond to the agreed costs and charges.	<b>Cost &amp; charges</b>
<b>Consumer understanding</b>	How we ensure that our documentation and reports are understood by the customer and how we ensure that we meet the needs of vulnerable customers.	<b>Accessibility</b>
<b>Consumer Support</b>	An assessment of the service we offer, the timely delivery of reporting, the security of data, the customer contact, updates for suitability assessments and the interest paid on cash deposits.	<b>Functionality, support &amp; tools</b>

We consider the value of features and benefits by individual product against the needs of each target market segment along their customer journey, particularly considering the events where potential harm to outcomes could occur.

Pillar	How it adds value	What does the assessment include?
<b>1.Platform strength and service</b>	Considers whether our reputation, financial strength, modern technology, core operations and business continuity can give peace of mind and assurance to our customers that the quality of our firm will meet their needs and objectives	<ul style="list-style-type: none"> <li>▶Reputation</li> <li>▶Financial strength, profitability, stability, technology, business continuity</li> <li>▶Core transactional processes and services</li> <li>▶Client money handling</li> <li>▶Dealing and custody</li> <li>▶Comparison with peers/competitors particularly those using similar technology</li> <li>▶Client and adviser feedback and net promoter scores</li> </ul>
<b>2. Wrapper range</b>	Demonstrates the broad range of wrappers that are designed and managed to meet target market needs and objectives across all stages of our customers' financial journeys	<ul style="list-style-type: none"> <li>▶Range and availability</li> <li>▶ISA/JISA</li> <li>▶CIA</li> <li>▶CRA</li> <li>▶CIB</li> <li>▶Trusts</li> <li>▶CashHub</li> </ul>
<b>3. Cost and charges</b>	Our charges should provide fair value over the lifetime of a customer's relationship with us and be reasonable compared to the overall benefits expected. Our charges should not result in reducing expected potential outcomes to levels where a customer would have better outcomes by not investing. Further our charges broadly reflect our costs of manufacture and distribution, and are competitive even if in a dominant market position	<ul style="list-style-type: none"> <li>▶Platform charge</li> <li>▶Dealing charges</li> <li>▶Appropriateness of charges for all our target customers and their needs and requirements</li> <li>▶Comparison with peers/competitors (comparable market rates)</li> <li>▶The cost of providing the service to which the charge relates</li> <li>▶Different charges incurred by different groups of customers through their lifestages, and advice journeys</li> </ul>

Table continued overleaf

Pillar	How it adds value	What does the assessment include?
<b>4.Fund range &amp; asset classes</b>	We should provide a scrutinised wide investment choice that allows diversification and help our different target market customers to achieve desired outcomes by investing in suitable asset classes and allow appropriate responses to changes in market conditions and their circumstances.	<ul style="list-style-type: none"> <li>▶ Investment range availability</li> <li>▶ Asset classes</li> <li>▶ Discounted fund charges</li> <li>▶ Initial fee/switching charges</li> <li>▶ Cash treatment</li> <li>▶ Centralised investment proposition support</li> <li>▶ Fund onboarding due diligence</li> <li>▶ Fund voting policy</li> <li>▶ Ongoing fund range and target market monitoring</li> </ul>
<b>5. Functionality, support &amp; tools</b>	We should provide a wide range of functionality and tools that allow customers and their advisers to efficiently implement their tax and financial planning objectives and manage their investment portfolios and outcomes.	<ul style="list-style-type: none"> <li>▶ Online Customer Centre</li> <li>▶ Contact centre</li> <li>▶ Mobile app</li> <li>▶ Adviser support</li> <li>▶ Technical support</li> <li>▶ Adviser training</li> <li>▶ Range of tools – investments analysis, risk profiling, portfolio planning, capital gains reporting, asset allocations</li> </ul>
<b>6.Accessibility Features</b>	We should demonstrate that our customers receive timely and clear communications about their investments and service, including the options available to them, that helps them pursue their financial objectives. Our customers should receive support, when they need it, and that they can contact Quilter in a way that they choose. They can make changes to their information and investments; these are dealt within in a timely manner, and that their circumstances are understood and that Quilter provides the customers with appropriate support.	<ul style="list-style-type: none"> <li>▶ Downtime and advance communication</li> <li>▶ Fraud/scam prevention and support</li> <li>▶ Review of our accessibility features and how they would affect different groups of customers</li> <li>▶ Additional needs of Vulnerable Customers</li> </ul>
<b>7. Governance</b>	To support every one of the above pillars we can evidence a high quality of robust governance and oversight via our procedures and industry feedback.	<ul style="list-style-type: none"> <li>▶ Industry feedback</li> <li>▶ Internal governance scorecards</li> <li>▶ Policy compliance</li> <li>▶ Ongoing Monitoring</li> </ul>

## Results of our assessment of value

Each of the above pillars were examined at an overall level as well as taking into account the product wrapper and the different segments of the target market. Our assessment found that our charges provide fair value across all our products and customer groups, including those with characteristics of vulnerability.

Product/Wrapper	Value Assessment Outcome
ISA & JISA	✓ Fair Value
CIA	✓ Fair Value
CRA*	✓ Fair Value
CIB*	✓ Fair Value



Customer Segment	Value Assessment Outcome
Starting Savings Journey	✓ Fair Value
Growing Wealth	✓ Fair Value
Approaching/at retirement	✓ Fair Value
In retirement/decumulation	✓ Fair Value
Intergenerational wealth transfer	✓ Fair Value

\*This also includes our closed book business written on charge bases 1 and 2

### The platform and all products/wrappers

Assessment Pillar	Pillar Information
<b>1. Platform Strength &amp; Service</b>	<ul style="list-style-type: none"> <li>▶ Quilter is financially stable and is a constituent of the FTSE 250 Index. AKG awarded a financial strength rating of A ('Superior') for QIPL and B+ ('Very Strong') for QLPL as of 5 January 2024</li> <li>▶ QLPL is well capitalised, with a Solvency II ratio of 214% as at year end 2023</li> <li>▶ Flows and AUM growth are consistent vs competitors</li> <li>▶ The technology used is modern and robust</li> <li>▶ Platform features offered are market leading</li> <li>▶ Business Continuity and Resilience plans are thorough</li> <li>▶ Quality and breadth of service and features is consistent with the platform's Pricing Comparison versus Peers and Advisers are keen to use the platform, even when not the cheapest.</li> <li>▶ Operationally, QIP provides excellent service, adviser, and customer experience with strong trust pilot, NPS and customer satisfaction scores as well as various industry awards:               <ul style="list-style-type: none"> <li>Adviser Asset 2024 Platform Rating - Quilter's platform received a platinum rating for the ninth time.</li> <li>Defaqto 2024 Gold Service awards for                   <ul style="list-style-type: none"> <li>• Platform</li> <li>• Pension</li> <li>• Investment bond</li> </ul> </li> <li>Defaqto 2024 5 Star awards                   <ul style="list-style-type: none"> <li>• Platform</li> <li>• Personal Pension</li> <li>• Drawdown Pension</li> <li>• Onshore Bond</li> </ul> </li> </ul> </li> <li>▶ QIP has a well-established vulnerable customer support model and monitors their outcomes</li> </ul>
<b>2. Wrapper Range</b>	<ul style="list-style-type: none"> <li>▶ The platform provides an extensive range of wrappers which are feature rich for customers covering ISA, JISA, General investment account (CIA), a unique on-platform onshore bond (CIB), market-leading personal pension (CRA), and CashHub, Powered by Bondsmith, an online savings marketplace that offers a choice of savings accounts from a regularly reviewed panel of banks and building societies</li> </ul>

Table continued overleaf

## The platform and all products/wrappers - Continued

<b>3. Cost and Charges</b>	<ul style="list-style-type: none"> <li>▶ A simple tiered service/product charge, with a market-leading family linking discount available to reduce overall costs</li> <li>▶ No additional charges over the lifetime of a product e.g. drawdown</li> <li>▶ The only additional charges are trading charges applied if investing with ETIs</li> <li>▶ There is no Product/Service Charge applied to any money held in cash in the CIA, ISA, JISA or CRA. Instead, we are paid by retaining a proportion of the interest received from our banking partners on any cash held</li> </ul>
<b>4. Fund Range &amp; Asset Classes</b>	<ul style="list-style-type: none"> <li>▶ Over 2,600 unit trust and OEIC funds to choose from</li> <li>▶ Access to exchange Traded Funds (ETFs), Exchange Traded Commodities (ETCs) and Investment Trusts (not CIB)</li> <li>▶ Cash account (not CIB)</li> <li>▶ Access to our WealthSelect Managed Portfolio Service and its range of Managed, Responsible and Sustainable portfolios, across active, blend and passive investment styles to meet wide range of client needs</li> <li>▶ Advisers choosing to operate (or outsource to over 85 discretionary firms) their centralised investment proposition can add material benefits to customers through our efficient cash management, smart trading functionality and flexible model portfolio management</li> </ul>
<b>5. Functionality, Support &amp; Tools</b>	<ul style="list-style-type: none"> <li>▶ Electronic re-registration and straight through processing of many transactions</li> <li>▶ Smart trading functionality that reduces client time out of the market</li> <li>▶ Online one-off customer withdrawals of up to £75,000, as well as regular withdrawals</li> <li>▶ Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month</li> <li>▶ Manage multiple Investment strategies within the same account, for different time horizons</li> <li>▶ Automated cash management functionality that ensures client only holds enough cash for 6 month's fees and charges</li> <li>▶ Regular savings options, phased investment and straight through processing of cash transfers and quick bed and ISAs support accumulating customers, whilst automatic and flexible pension tax efficient withdrawals provide comprehensive support in the decumulation phase</li> <li>▶ Customers' advisers benefit from training and access via dedicated platform specialists to use online service and planning tools to their full potential</li> <li>▶ Customers' advisers have access to a suite of planning tools and MI that helps them make better informed recommendations for clients</li> </ul>
<b>6. Accessibility Features</b>	<ul style="list-style-type: none"> <li>▶ Customer can instantly view, assess and transact on all their accounts and investments in one convenient place, using their computer, tablet or mobile device (via all browsers) or through the Quilter customer app</li> <li>▶ Call centre, digital and postal contact points</li> <li>▶ Clear customer documentation</li> <li>▶ Knowledgeable and helpful staff with high customer service ratings</li> <li>▶ Protection against fraud and scams via the platform's prevention work</li> <li>▶ The needs of vulnerable customers are properly considered</li> </ul>
<b>7.Governance</b>	<ul style="list-style-type: none"> <li>▶ In house complaints team with various customer contact points, complaints dealt with in line with FCA guidelines</li> <li>▶ Awareness of vulnerability at all touchpoints and able to make reasonable adjustments to accommodate in line with our vulnerable customer definitions.</li> <li>▶ Product reviews are conducted frequently focusing on core product benefits and customer journey to ensure suitability and value for the customer</li> <li>▶ Complaints reviews are conducted monthly</li> </ul>



## Additional Stocks and Shares ISA & Junior ISA information

Assessment Pillar	Additional Information
<b>1. Platform Strength &amp; Service</b>	The ISA manager is Quilter Investment Platform Limited, and the nominee company is Quilter Investment Platform Nominees.
<b>2. Wrapper Range</b>	<ul style="list-style-type: none"> <li>▶ Flexi ISA capability allowing clients to meet any short-term cash needs and then replenish savings</li> <li>▶ Junior ISA is open to children under the age of 18, offering tax efficient savings for future generations</li> <li>▶ A minimum investment of £500 for lump sums and £50 for regular investments</li> </ul>
<b>3. Functionality, Support &amp; Tools</b>	<ul style="list-style-type: none"> <li>▶ Straight-through online Bed &amp; ISA facility to move funds from the client's Collective Investment Account</li> <li>▶ Facility to 'gross up' contributions to include adviser fees and optimise the client's annual ISA allowance</li> <li>▶ Online one-off customer withdrawals of up to £75,000, as well as regular withdrawals</li> <li>▶ Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month</li> <li>▶ Withdrawals are not possible from a JISA</li> <li>▶ JISA will automatically convert to an ISA on the child's 18th birthday</li> </ul>

## Additional Collective Investment Account (CIA) information

Assessment Pillar	Additional Information
<b>1. Platform Strength &amp; Service</b>	The plan manager of our Collective Investment Account is Quilter Investment Platform Limited, and the nominee is Quilter Investment Platform Nominees Limited.
<b>2. Wrapper Range</b>	<ul style="list-style-type: none"> <li>▶ Individual and joint account options available</li> <li>▶ Trustee investments from registered pension schemes (SIPP and SSAS) are accepted</li> <li>▶ Can be used as an underlying asset of an offshore bond, to switch between unit trust and OEIC funds free of any transaction charges</li> </ul>
<b>3. Functionality, Support &amp; Tools</b>	<ul style="list-style-type: none"> <li>▶ The Capital Gains Reporting Tool is available to help you with your client's tax return</li> <li>▶ Straight-through, online Bed &amp; ISA facility to move funds to the client's ISA</li> <li>▶ Electronic re-registration</li> <li>▶ Online one-off customer withdrawals of up to £75,000 for accounts held in a customer's sole name</li> <li>▶ Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month</li> </ul>

## Additional Collective Retirement Account (CRA) information

Assessment Pillar	Additional Information
<b>1. Platform Strength &amp; Service</b>	A Defaqto 'Gold' service rated pension scheme provided by Quilter Life & Pensions Limited.
<b>2. Wrapper Range</b>	<p>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 customer needs, help continue to grow their pensions, be more tax-efficient and maximise their legacy if required. The CRA also offers:</p> <ul style="list-style-type: none"> <li>▶ a multiple sub account model where uncrystallised and crystallised pension monies are held in separate sub accounts</li> <li>▶ separate asset allocations for uncrystallised and crystallised savings</li> <li>▶ flexi-access drawdown and capped drawdown within the same client account</li> <li>▶ Exchange Traded Funds (ETFs), Exchange Traded Commodities (ETCs) and Investment Trusts</li> <li>▶ re-registration functionality</li> <li>▶ Direct Debit collections and regular withdrawals can be paid on any date from 1st – 28th of the month</li> <li>▶ the maximum age for all transfers (including uncrystallised) will be 85.</li> <li>▶ full range of dependant flexi-access drawdown options meaning your pension is passed down tax-efficiently</li> <li>▶ pre-funding of tax relief so money is invested sooner enabling it to grow for longer</li> </ul>
<b>3. Functionality, Support &amp; Tools</b>	<p><b>Nine flexible ways of withdrawing money from the CRA, all at no additional charge:</b></p> <ol style="list-style-type: none"> <li>1. Flexi-access drawdown options (FAD)</li> <li>2. Capped drawdown</li> <li>3. Lump sums from uncrystallised funds through FAD</li> <li>4. Small pots (from age 55)</li> </ol> <p>A maximum of £30,000 can be taken as small lump sums of £10,000 each 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 using the current emergency tax code.</p> <p>Each small pot must be processed individually. The rules state that each small pot from a HMRC perspective must have a different date when reported as there is now a new small pot indicator for each one when reported. Each small pot will also have a P45.</p> <p><b>Three tax-efficient* regular income options:</b></p> <ol style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>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</li> </ol> <p>The above regular income options can be set up alongside existing flexi-access income withdrawals</p> <p><i>*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.</i></p> <ol style="list-style-type: none"> <li>8. Open market option</li> <li>9. Legacy planning death benefit options</li> </ol>

## Additional Collective Investment Bond (CIB) Information

Assessment Pillar	Additional Information
<b>1. Platform Strength &amp; Service</b>	The Collective Investment Bond is provided by Quilter Life & Pensions Limited.
<b>2. Wrapper Range</b>	<ul style="list-style-type: none"> <li>▶ The widest range of trusts is the market meeting all clients' needs for access, flexibility and IHT efficiency for effective estate planning</li> <li>▶ Can be used in conjunction with the Collective Investment Account for tax-efficient withdrawals</li> <li>▶ Capital Protected Death Benefit is available at an extra charge, providing protection of capital in the event of the life assured's death</li> </ul>
<b>3. Functionality, Support &amp; Tools</b>	<ul style="list-style-type: none"> <li>▶ 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</li> <li>▶ Online one-off customer withdrawals of up to £75,000 for bonds held in a customer's sole name</li> </ul>

### Additional CRA and CIB information for closed book business written on Charge Bases 1 or 2

Overall, we have concluded that the closed book provides value to customers. It provides a similar range of services, features, functionality and support to our open book (Charge Basis 3).

The breadth and range of funds is appropriate, but we expect the choice of funds to continue to diminish over time as fund groups move away from bundled share classes.

The fixed investor charge can be high in % terms at lower investment values and we will be taking action to avoid potential harms in this area.

Charge Basis 1 has higher charges, linked with commission, but provides value where the customer can benefit from their adviser relationship.

Charge Basis 3, our open book, typically provides better value and we intend to move customers to this structure in time, subject to avoiding adverse tax outcomes.

We are aiming to provide an update on our progress in this move in 2025.

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*Please be aware that calls and electronic communications may be recorded for monitoring, regulatory and training purposes and records are available for at least five years.*

*Quilter is the trading name of Quilter Investment Platform Limited which provides an Individual Savings Account (ISA), Junior ISA (JISA) and Collective Investment Account (CIA) and Quilter Life & Pensions Limited which 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 1680071 and 4163431 respectively.*

*Registered Office at Senator House, 85 Queen Victoria Street, London, EC4V 4AB, United Kingdom. Quilter Investment Platform Limited is authorised and regulated by the Financial Conduct Authority. Quilter Life & Pensions Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Their Financial Services register numbers are 165359 and 207977 respectively. VAT number 386 1301 59.*

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