

TPO INVEST SIPP KEY FEATURES DOCUMENT

The Financial Conduct Authority is a financial services regulator. It requires us, Hubwise Securities Limited, to give you this important information to help you decide whether our TPO Invest SIPP, hereafter referred to as ‘the SIPP’, is right for you. You should read this document carefully so that you understand what you are buying, and then keep it safe for future reference.

About us

The SIPP is a Self-Invested Personal Pension (SIPP) scheme established under one master trust deed and set of rules (copies of which are available on request) and registered in accordance with the Finance Act 2004 in the name ‘Hubwise SIPP’ under registered pension scheme number 00837995RE. The SIPP is provided and operated by Hubwise Securities Limited, a UK registered company under number 06071374 which is authorised by the Financial Conduct Authority (FCA) to provide regulated products and services. The trustee of the SIPP is SS&C Trustees Limited, (a company registered in the UK under company number 04162986 whose registered address is SS&C House, St Nicholas Lane, Basildon, Essex, England, SS15 5FS).

This document contains the following information:

- The aims of the SIPP
- Your commitments if you use the Self Investments (meaning those investments held within your SIPP)
- The risks associated with the Self Investments
- Questions and answers that explain the plan’s main features of the Self Investments
- How to contact us

Aims

- To build up a sum of money tax efficiently, that can be used to provide you with an income at any time after age 55. This will change to age 57 from 6th April 2028
- To give you control of your own pension investment strategy
- To allow you to invest a portion of your plan in assets of your choosing as long as they are approved for inclusion on the Hubwise platform
- To give you the flexibility you need if your circumstances change in the future

Your Commitment

- Before purchasing the SIPP you need to consider whether you have sufficient investment experience and are prepared and responsible for making decisions about how your money is invested during the time you hold the SIPP, If you have appointed a financial adviser, they will be able to assist with this process

- You will need to make at least one payment into your SIPP. This can be either a transfer from an existing pension you hold or a contribution from you or your employer. Please refer to the sections entitled “Can I transfer my existing pension to a SIPP?” and “How much money can I contribute in a year and what tax relief will I receive on contributions?”
- You must be prepared to keep your money invested without access to it, normally to at least age 55 (rising to age 57 in April 2028)
- You will need to pay the charges laid out on our website <https://www.ssctech.com/about/disclosures>
- You should regularly review your investments and the amount you pay with your Financial Adviser

Risk

Investments can fall as well as rise and you may find that the value of your SIPP does not meet your investment expectations. Past performance of investments is not necessarily an indication of future performance.

You should also consider how long you are required to hold a particular investment and if this is suitable for your lifestyle and investment aims. If investing outside of the UK for example, you may experience higher dealing costs and may be subject to varying exchange rates. You should also be aware that the investment/s you choose may pose a liquidity risk and you should consider the timespan of your investment/s and how easily you can disinvest should you wish to do so. We do not give financial or tax advice under any circumstances.

With the freedom to choose your own investments comes responsibility; you should make sure that you are comfortable making investment decisions. Please note that the SIPP is denominated in British Pounds therefore you may experience bank charges when investing in products with a different currency. Our charging schedule is described below and also on our website, <https://www.ssctech.com/about/disclosures>

What is a SIPP?

A Self-Invested Personal Pension or SIPP is a tax-efficient investment vehicle through which you can invest in a wide range of UK and international investment products. A SIPP offers up to 45% tax relief¹ on contributions. Any investment gains that arise from your SIPP are free² from income, dividend and capital gains tax.

¹ HM Revenue and Customs practice and the law relating to taxation are complex and subject to individual circumstances and changes which cannot be foreseen.

² Tax concessions are not guaranteed and may change in the future. Tax free means the investor pays no tax.

Who can open the SIPP?

Any UK resident person can open a SIPP.

How do I open the SIPP?

To open the SIPP you need to:

- read the SIPP Terms and Conditions, Hubwise Securities Limited Terms and Conditions, this Key Features Document and any other documentation which we provide you with, very carefully;
- be aware of the risks attached to the SIPP and be comfortable with the fact that the value of your investments could fall as well as rise;
- complete the relevant application form;
- either transfer an eligible existing pension (see details below) or make an initial contribution to your SIPP

The SIPP application process is managed electronically. Once received, the relevant documentation is uploaded and submitted via the web portal by your adviser firm and sent to us for processing.

By choosing to open a SIPP, you are agreeing to be bound by the Terms and Conditions and the Trust Deed and Rules of the SIPP.

Can I change my mind?

Yes, you have a legal right to cancel the establishment of your SIPP, within 30 days of when you receive our welcome pack which contains a cancellation notice. Please note that any fees incurred during the time between the establishment of the SIPP and the cancellation will be borne by you. Similarly, any losses on investments are borne by you.

Can I transfer my existing pension to the SIPP?

In most cases, yes. We accept transfers in from HM Revenue and Customs recognised schemes. The transfer must be on a fully advised basis by a suitably-qualified pensions specialist. Defined benefit schemes (e.g. final salary schemes) generally prevent transfers to a SIPP unless you have received personal advice from an adviser who is regulated by the Financial Conduct Authority and holds the appropriate pension transfer qualifications. Please contact us if you wish to transfer your existing pension to the SIPP. Please note that, although we do not charge a fee to transfer your pension into the SIPP, your pension provider may charge you to transfer out of their scheme.

How much money can I contribute in a year and what tax relief will I receive on contributions?

There is no limit on the amount of money you can contribute to your SIPP each year but the amount you contribute may have tax implications. The contribution amounts are based on your relevant UK earnings. If you have no relevant UK earnings, you can still make contributions up to £3,600 each year that will benefit from tax relief. If you do have relevant UK earnings then you can receive tax relief³ on all contributions (with the exception of employer contributions) up to the amount you earn to a maximum of the Annual Allowance amount in the relevant tax year. We will claim tax relief at the basic rate (currently 20%) from HMRC on a monthly basis. Any higher and additional rates of tax relief will need to be reclaimed from HMRC through your self-assessment.

However, if you make contributions above the current Annual Allowance limit of £60,000, you may incur a tax charge via HMRC's 'annual allowance charge'. The annual allowance is set each year by the UK Government and therefore may change in the future. It is possible for your annual allowance to be reduced if you are a high earner or have previously flexibly accessed some of your benefits.

If you have triggered the Money Purchase Annual Allowance you may only contribute a maximum of £10,000 to your pension schemes in any given tax year, please note the government are at liberty to amend this limit.

Please seek specialist tax advice if you have specific tax concerns. All contributions made into your SIPP are subject to a correctly completed and signed application form submitted via your adviser.

Is there a minimum contribution level?

If you transfer your existing pension to the SIPP there is no requirement to make any contribution. If you do wish to contribute, the minimum level for one-off contributions is £100 and for regular contributions is £50.

Who can contribute to my SIPP?

You can make personal contributions into your SIPP from your nominated bank account. It is possible to request us, via your Adviser, to add one additional bank account (in your own name) which may then be used to make contributions to your SIPP. Your employer and other third parties can also make contributions.

Can I have more than one SIPP?

We would not open two SIPPs for you but it is possible to have another SIPP with a different provider. If you run two SIPPs concurrently you may have to pay a tax relief charge to HMRC if you have received more than the allocated tax relief in any one year.

³ Tax concessions are not guaranteed and may change in the future. Tax free means the investor pays no tax.

Who manages the investment portfolio held in my SIPP?

All investment decisions in relation to your SIPP are taken by you personally and your financial adviser. We are neither managers nor advisers; it is imperative that you consider if the SIPP is an appropriate investment product for you based on your investment experience and personal circumstances.

Can I hold property in the SIPP?

No. The SIPP does not allow investment in property.

How can I check the value of my SIPP?

You can contact your adviser and they will be able to tell you the current value of your fund. If you have access to the online web portal, you can check the value of your SIPP directly.

We will send you a yearly statement for your records. It is also prudent to review your SIPP on a regular basis to ensure that it is the correct product for your investment needs.

What is the Lifetime Allowance?

The Lifetime Allowance was the amount that you could receive before being liable for a tax charge, however the Lifetime Allowance charge was removed on 6th April 2023, and the Lifetime Allowance has been removed from 5 April 2024 and replaced by the Lump Sum Allowance and the Lump Sum Death Benefit Allowance.

What is the Lump Sum Allowance and the Lump Sum Death Benefit Allowance:

From 6 April 2024 your benefits will be tested against the Lump Sum Allowance of £268,275 at any Relevant Benefit Crystallisation Event (RBCE), this occurs when a Pension Commencement Lump Sum (PCLS) or Uncrystallised Funds Pension Lump Sum (UFPLS) is taken from the scheme, other events will affect this limit and further information can be provided on request.

Please note that if you hold protection or require additional information on how to take your benefits please contact your financial adviser.

The Lump Sum And Death Benefit Allowance of £1,073,100 ⁴ applies at a Relevant Benefit Crystallisation Event, when someone dies or on the payment of a Serious Ill-Health Lump Sum. It is important to remember most tax-free benefits paid during the individual's lifetime are also deducted from this allowance.

⁴At present the legislation written by the HMRC does not allow for the Lump Sum Allowance or Lump Sum Death Benefit Allowance to increase.

When can I access my SIPP?

The earliest age you can start taking money from your SIPP is 55 years (due to rise to 57 in 2028) unless you are in serious ill health, as defined by the Finance Act 2004.

Please note that if you are transferring your pension scheme to the SIPP please check with your current scheme and with your adviser if the transfer would qualify to allow the Protected Retirement Age to remain. If a transfer is received with a Protected Retirement Age this will apply to the transferred benefits only.

How can I take my benefits?

You can drawdown up to 25% of your fund up to the limit of the Lump Sum Allowance from the age of 55 as a Pension Commencement Lump Sum (PCLS), but the remaining 75% must either be designated to drawdown or transferred to another provider to purchase an annuity. From 2028 the age you can withdraw a PCLS will rise to 57 years.

After taking a PCLS, you can opt to have complete flexibility (known as 'flexi-access') as to how you drawdown from your drawdown plan (i.e. any combination of lump sums or monthly payment), but each drawdown will be taxed at your normal income tax rate, whether you take further lump sums or a monthly income. As soon as you take any drawdown income from your SIPP a restriction on any future tax relief applies to contributions to your SIPP or any other money purchase pensions that you have. This restriction is called the Money Purchase Annual Allowance (MPAA).

Alternatively, you can take money direct from all your pots without having to put the money into a drawdown plan and 25% of this sum will be tax free with the remaining 75% subject to marginal rate income tax. This is called an 'Uncrystallised Funds Pension Lump Sum' ('UFPLS'). You can take one or more UFPLS payments and these can be regular or irregular payments. Payment of an UFPLS will trigger the MPAA.

Across all personal pension arrangements, you may be able to take up to three small pots subject to the SIPP value of each arrangement being under £10,000 and as long as when taken it means all the SIPP funds in each arrangement are fully exhausted. 25% will be tax free and 75% will be subject to marginal rate income tax in the same way as UFPLS. Taking a small pot lump sum will not trigger the MPAA. These benefits are not tested against the Lump Sum Allowance or the Lump Sum Death Benefit Allowance.

After I have taken a PCLS, does my SIPP still benefit from tax relief?

Yes. If you are in flexi-access drawdown, until you drawdown from your drawdown plan, you receive tax relief on contributions up to your UK relevant earnings.

Tax relief is available on contributions up until age 75 regardless of if it's in drawdown.

Taking income from drawdown will trigger MPAA but you can still make contributions and claim tax relief up to MPAA.

What happens if I am in capped drawdown?

If you had started to take payments from your pension before 6th April 2015, your pension is designated as capped drawdown. This will mean that you are allowed to take income from your pension up to a certain limit each year. You are entitled to keep your pension as capped drawdown or if you wish to have more flexibility, you can convert to a flexi-access drawdown arrangement meaning that there would be no capped income limit. You will need to consider implications such as the MPAA.

Do you offer annuities?

No. If you are looking to purchase an annuity, you must transfer all or part of your pension to an annuity provider.

Is SIPP income subject to National Insurance?

No.

What happens to my SIPP if I die?

When we are notified of your death by your personal representative, we will ask for a copy of your death certificate. We will carry out due diligence on the beneficiaries and then discuss options with them. Please note that the scheme administrator retains ultimate discretion over the distribution of your pension, despite a beneficiary being named.

From 6 April 2024 any death benefits payable are tested against the Lump Sum Death Benefit Allowance and any payment in excess of the limit is charged at the beneficiaries marginal rate of income tax.

If you die before you reach the age of 75, your beneficiary can choose:

- to take a tax-free⁵ lump sum; or
- transfer the SIPP into their own name (provided certain conditions are met) and draw a tax-free income

For death benefits to remain tax-free, they must normally be paid out as a lump sum or designated to a beneficiary's drawdown within two years of the scheme administrator being notified of the member's death.

Please note that any benefits above the Lump Sum Death Benefit Allowance and paid as a lump sum will be taxed at the beneficiaries marginal rate.

If you die after the age of 75, your beneficiary can choose to:

- take the whole pot as a lump sum but this will be subject to a tax charge at the marginal rate of income tax of the beneficiary; or
- to transfer the SIPP into a pension arrangement in their own name which can be used to take an income via drawdown. Any income taken will be subject to income tax at the beneficiary's normal rate

⁵ Tax concessions are not guaranteed and may change in the future. Tax free means the investor pays no tax.

Do I have to choose a beneficiary to receive my SIPP if I die?

No. Clients normally choose a beneficiary e.g. a spouse or a child. This is not legally required but we strongly recommend that you do tell us of your wishes to help ensure we consider paying the correct beneficiaries. If a beneficiary is not nominated this can impact the options that the recipient of the scheme benefits may receive, please seek financial advice in relation to this.

How much does the SIPP cost?

Details of the charges applicable to the SIPP can be found in the Schedule of Charges and in your personal illustration.

When do I pay the administration fee?

We will withdraw the annual fee from your account on a monthly, pro-rata basis.

How is my money protected?

Any and all of your money in your SIPP client account is held in trust in a client money account, designated in accordance with the FCA Client Money rules, and managed by Hubwise Securities Limited. For further information please refer to the "Client Money" section within the Platform Terms and Conditions.

Ability to disinvest

If you owe us any outstanding fees, we reserve the right to disinvest proportionally from across your portfolio.

If I am not satisfied, can I transfer out to another provider?

Yes, you can transfer out to another provider as long as the provider is HMRC approved.

If I have any queries, who can I speak to?

Any queries relating to your SIPP should be directed to the Platform Services team who will then ask one of the Specialist Pensions Administration team to get in touch. The Platform Services team can be reached via phone at +44(0)1283 495 245.

Is my money protected in any way?

Money held in your SS&C Hubwise SIPP client account is covered by the FSCS's UK deposit recovery scheme, up to the maximum (£85,000 at the time of writing). For more information, please visit: www.fscs.org.uk.

Who can I contact if I have any further questions?

If you need any further information about this product, please contact your financial adviser in the first instance or call +44(0)1283 495 245.

You also have access to the Money Helper Service. Money Helper offers free and impartial guidance about personal and workplace pensions and assistance where policyholders have failed to resolve any difficulty with the administrator of their pension scheme. You can contact Money Helper at: Money Helper Pensions Guidance, Money and Pensions Service, 120 Holborn, London, EC1N 2TD, call 0800 011 3797 or email pensions.enquiries@moneyhelper.org.uk If you are aged over 50 you can receive free and impartial pensions guidance from Pension Wise. Please visit their website at www.pensionwise.gov.uk or call 0800 138 3944 for more information or to book an appointment.

How to complain

If you are not satisfied with any aspect of the service you have received from us, please contact the complaints team on the contact details in the previous section. A copy of the complaints procedure can be provided on request.

Any complaint that we can not settle may be referred to the Financial Ombudsman at:

The Financial Ombudsman

South Quay Plaza

183 Marsh Wall

London

E14 9SR

Telephone: 0800 023 4567

Calls to this number are normally free for people ringing from a "fixed Landline" but charges may apply if calling from a mobile phone.

Telephone: 0300 123 9123

Calls to this number are charged at the same rate as 01 and 02 numbers on a mobile tariff.

Email: complaint-info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk

Making a complaint will not affect your right to take legal proceedings.

Can you close my SIPP?

The Trustee has absolute discretion over your SIPP and can close it at any time. In this instance, we would give you 30 days notice.

Business language

All communications will be in English.

Law

The SIPP operates under the laws of England and Wales. Any disputes would be subject to the English Court system exclusively. This Key Features Document and the legislation referred to herein are correct at the time of writing.

The TPO Invest SIPP is provided and operated by Hubwise Securities Limited, a company authorised and regulated by the Financial Conduct Authority (FRN: 502619) and registered in England and Wales 06071374. T: 01283 495245 E: customer.services@hubwise.co.uk W: www.hubwise.co.uk Waverley Court, Wiltell Rd, Lichfield, Staffs WS14 9ET.
