



## **DUE DILIGENCE**

Everything you need to know about Thanks Wealth Planning

Created by Sam Whybrow



Name	Thanks Wealth Planning Ltd		
Company Reg No.	10616529. Our registration can be found at: https://find-and-update.company-information.service.gov.uk/company/10616529		
NO.	https://ind-and-update.company-information.service.gov.uk/company/10616529		
FCA	840337. Our registration can be found at:		
Registration	https://register.fca.org.uk/s/firm?id=0010X00004SbVc0QAF		
No.			
Data	We are registered with the Information Commissioner's Office for Data Protection under		
Protection	reference ZA513586		
Reference No.			
Registered	W8a Knoll Business Centre, 325-327 Old Shoreham Road, Hove, England, BN3 7GS		
address			
Trading	3rd Floor, 86 - 90 Paul St, London EC2A 4NE		
Address			
Contact details	<ul> <li>Telephone: 0203 8287107</li> <li>Mobile: 07563 529918</li> </ul>		
	<ul> <li>Mobile: 07563 529918</li> <li>Website: www.thankswp.com</li> </ul>		
	Email: sam@thankswp.com / debbie@thankswp.com		
Business type	Limited Company (Ltd)		
How is the	Directly authorised and regulated by the Financial Conduct Authority		
firm regulated			
Management	Sam Whybrow / Managing Director / Compliance Officer / Chartered Financial Planner		
Team	<ul> <li>Debbie Whybrow / Director / Office Manager / Administration Support</li> </ul>		
Areas of	• Wealth Preservation: We help our client's make smart financial decisions. The goal of		
Expertise / Key	wealth preservation is to produce the best possible financial experience and investment		
Client	outcomes consistent with our client's time frame, goals, and tolerance for risk to ensure		
Concerns We Address	they will be alright, spend without fear of running out and manage life and financial		
Address	uncertainties so they live the life they want.		
	• Wealth Enhancement: We help our clients mitigate tax: minimising the impact of taxes on		
	clients' investment returns and wealth while ensuring the cash flow they need. In short, to		
	<ul> <li>make our client's wealth last longer and work smarter.</li> <li>Wealth Transfer: We help our clients take care of heirs: finding and facilitating the most</li> </ul>		
	tax-efficient way to pass assets to loved ones in ways that meet the client's wishes with		
	minimal difficulty and cost.		
	<ul> <li>Wealth Protection: We help our clients mitigate their concerns about protecting their</li> </ul>		
	wealth against catastrophic loss, potential creditors, litigants, children's spouses and		
	potential ex-spouses and identity thieves—in short, ensuring that their assets are not		
	unjustly taken.		
	• Charitable Giving: We help our clients look outward beyond their own families to the world		
	at large. Charitable giving comes with its own unique set of challenges—from selecting the		
	appropriate means of giving (such as direct gifts, donor-advised funds, or private family		
	foundations) to selecting causes and specific organizations that will have the biggest		
	impact.		



		VEALITIEANNI	
Offered Products	Typically, the products we offer will include:		
	<ul> <li>Investments: ISAs, OEICs, Unit Trusts, Onshore Bonds, Offshore Bonds, Business Relief Schemes, VCTs &amp; EIS</li> </ul>		
	• Pensions: Personal Pensions, SIPPS, Annuities, Drawdown, Pension Transfers (Money		
	<ul> <li>Purchase Schemes), Family Pension Trust, Deferred Pension SSAS and SSAS's</li> <li>Protection: Term Assurance, Critical Illness Cover, Income Protection, Keyperson,</li> </ul>		
	Shareholder & Partnership Protection, Family Income Benefit, Whole	Life and Relevant Life	
Advisory Team / Name	Role Professional Qualifications		
Sam Whybrow	<ul> <li>Sam acts as our client's Trusted Counsel &amp; Financial Custodian. He is our client's Chief</li> <li>Financial Officer (CFO) and addresses five key concerns for our target client market, consisting of Investment Consulting and Advanced Planning. He ensures that we work with our clients and their professional advisers on a collaborative basis with active Relationship Management. He is not an order taker for our clients or their professional advisers and will not act without providing proactive analysis and recommendations.</li> <li>Chartered Financial Planni</li> <li>Certified Financial Planner (S Registered Life Planner (S Financial Planning Certifi J05 (Pension Income Opt CF2 (Investment &amp; Risk)</li> <li>AF1 (Personal Tax &amp; Trus CF8 (Long Term Care Plan AF3 (Pension Planning)</li> <li>CF9 (Pension Simplification G60 (Pensions)</li> <li>R05 (Financial Planning P J01 (Personal Tax)</li> <li>J02 (Trusts)</li> <li>J04 (Pension Funding Op</li> </ul>	er (since July 2013) Since February 2012) cate 1, 2 & 3 cions) st Planning) nning) on)	
	LP2 (Financial Services Pr		
Compliance Risl Management	K		
Client	Client complaints received in the last 12 months	None	
Complaints	Client complaints received over career	None	
	Client complaints upheld by the Financial Ombudsman Service	None	
	Client complaints sent to our PI Insurers in the last 12 months	None	
	Compensation payments made to clients in the last 12 months	None	
	Details of any complaints outstanding	None	
Business	We have remote online backup of all Information Technology data, a rob		
Continuity	Plan, and a locum arrangement in place if anything were to happen that could prevent Thanks Wealth Planning from trading.		
Locum	Interface Financial Planning Limited, authorised and regulated by the Financial Conduct Authority <u>https://register.fca.org.uk/s/firm?id=001b000000MfesRAAR</u> . Financial Services Register No: 424729 Registered Address: 122 Hamstead Hall Road, Handsworth Wood, Birmingham, B20 1JB Registered in UK, No. 02644317		
Independent	Contact: Alan Moran Telephone: 0121 554 4444 Website: <u>https://www.interfacefinane</u> Email: <u>alan.moran.ifa@interface-ifa.co.uk</u> We contract the services of Compliance & Training Solutions Ltd (CA		
Compliance Monitoring	Compliance Consultancy who provide the following services.		
	Regular file audits		



	<ul> <li>Annual review of business systems and controls</li> <li>Independent technical assessments on advisers</li> <li>Technical compliance support</li> <li>Regular compliance &amp; regulation support</li> <li>Technical pension, investment, tax &amp; trusts helpdesks</li> <li>Registered in England and Wales under company number 05359419.</li> <li>Registered Office. 5-6 Broomfield Road, Elmstead, Colchester, Essex, England, CO7 7FD.</li> <li>Telephone: 01206 230804</li> <li>Email: info@complianceandtraining.co.uk</li> </ul>		
Professional	Collegiate Underwriting	Policy No: UKOPI19B3887	
Indemnity		Certificate No: S24526ZAmtrust IFA 23	
Insurance	18 Mansell Street	Inception: 2 September 2019	
	London	Renewal date: 1 September 2024	
	E1 8FE www.collegiate.co.uk		
	Authorised by the Financial Conduct Authority		
	reference number 307301.		
	Telefence humber 507501.		
Procedures	<ul> <li>We have a suite of procedure manuals that, dependent of read and sign to confirm they underst comply with all aspects. The procedures cover the formation of the procedures cover the formation of the procedures of the pr</li></ul>	<ul> <li>stand the compliance procedures and will following areas.</li> <li>Financial Reporting</li> <li>Management Reporting</li> <li>Information Technology</li> <li>Data Protection</li> <li>Customer Data Security</li> <li>Best Execution</li> <li>Centralised Investment Process</li> <li>Annual Fit &amp; Proper Testing</li> <li>Fair Processing</li> <li>Subject Access Request</li> <li>Consent</li> <li>Personal Data Breach</li> <li>Privacy Impact Assessment</li> <li>Code of Ethics</li> <li>Bribery</li> <li>Compliance Registers</li> <li>Vulnerable Persons</li> </ul>	
Professional	The firm and/or individual advisers are members of		
body	<ul> <li>The Personal Finance Society (<u>PFS</u>)</li> </ul>		
membership	<ul> <li>The Chartered Insurance Institute (<u>CII</u>)</li> </ul>		
	<ul> <li>The Chartered Institute for Securities &amp; Investm</li> </ul>	nent (CISI)	
Regulatory Audits	None to date		
Disciplinary	Neither our firm nor any principal, adviser, fee earn has ever been censured or disciplined by any profes	ssional body	
Thanks Wealth Planning Ltd is registered in England and Wales. Company number: 10616529. Registered office: First Floor, Telecom House,			



Financial & Business	
Planning	Thanks Wealth Planning Ltd is a private limited company established in February 2017 changing its name and brand from Sam Whybrow Consultancy Ltd in June 2019.
	Thanks Wealth Planning Ltd was established by Husband-and-Wife team Sam Whybrow and Debbie Whybrow. Both are Directors and each hold 50% of the shares in the business.
	The company mainly provides services to clients in and around, London and the Home Counties, but also has clients in Devon, Norfolk, Suffolk, Lancashire, Cheshire, and Wales. With our virtual meeting service, we can work with any person in the UK.
	Sam has worked in the financial services industry since 1996 and has been an Independent Financial Adviser since 2003 working for several directly authorised firms and appointed representative firms. His background proves ideal experience as a directly authorised business owner. Sam has been formally assessed as Competent Adviser Status (CAS) in all areas of his advisory role and holds a current Statement of Professional Standing (SPS).
	Debbie will be a non-advising Director within the company. She has over 25 years of banking and customer facing experience. Additional administration support will likely be fulfilled by utilising an outsourced paraplanner service from one of the leading industry providers.
	We have a sustainable income / client base that is served efficiently and effectively working directly with the FCA. We will use the skills of Sam as a Chartered Financial Planner, Certified Financial Planner and Registered Life Planner to continue to offer our clients a first-class service without compromise. We will continually adapt, innovate, and implement change to be at the forefront of the financial services sector we operate in. We will adopt the use of technology to improve client service and business efficiency so that we offer a state of the art and competitively priced product for our clients whilst continuing a service with a personal touch.
	Advisers are committed to professional development, and we will utilise the following to ensure they continue to meet the required standards:
	<ul> <li>Continual study and examination</li> <li>Regular external file checks</li> <li>Periodic field compliance On-site Health Checks</li> <li>Regular assessment of ongoing competence</li> <li>Industry forums, training days &amp; provider meetings &amp; seminars.</li> <li>CPD Portal administered by Competent Adviser &amp;/or CII</li> <li>Trade &amp; industry publications</li> <li>Compliance &amp; Pensions Technical libraries</li> <li>CATS online portal</li> </ul>
	Treating Customers Fairly (TCF) has always been evident in our business activities, and in our customer dealings. We have a robust TCF policy. The firm will also consult with CATS on TCF, and additional help will be sought from them to ensure the firm continues to treat its customers fairly.
	We have a 5-year business plan reviewed half yearly. The key objectives are: -
	<ul> <li>Maintain recurring revenue at around 75% of gross turnover to ensure business longevity.</li> <li>To deliver improved systems and controls for client's protection and enhanced services.</li> <li>Ensure ongoing staff training to ensure our team are consistently delivering for clients.</li> <li>Adopt robust systems and processes to continue to deliver our service efficiently.</li> </ul>
anks Wealth Pla	• To deliver improved customer service by listening and obtaining feedback from clients. Inning Ltd is registered in England and Wales. Company number: 10616529. Registered office: First Floor, Telecom House

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	WEALTH PLANN	
Regulatory	We comfortably exceed the capital adequacy requirements, of £20,000, to be always	
Solvency	maintained in our company bank account, as defined by the Financial Conduct Authority. The	
	capital resource requirement is held via capital and reserves already held in the company and	
	evidenced in the Management Accounts.	
Regulatory	We are already compliant with all the new requirements and believe the revised minimum	
Compliance	standards and requirements is a positive step in driving improvement in the quality of advice and service to the consumer.	
Use of third	We employ the following external resources to help deliver our service proposition. All our	
parties/tools	third-party providers are subject to due diligence assessments to ensure they remain suitable	
to help deliver	for the firm and our clients' needs and requirements. Based on the service selected, required,	
services,	and/or agreed, not all third-party providers will be accessible to every client.	
manage business and	MyThanks App (developed in conjunction with Moneyinfo): A secure online service which	
clients risks &	brings together our client's investments, savings, pensions, insurances, bank accounts, credit	
deliver front	cards, store cards, mortgages, loans, and property alongside all the associated paperwork.	
end client	Available to our clients on desktop, laptop, tablet, or mobile means that their finances are	
experience	accessible to them under a single login at any time, wherever they are. WhatsApp style push	
satisfaction	notifications to instantly let our client know when there are documents to sign or messages to	
	read so they do not get lost in a plethora of work and personal emails.	
	Banking level security and encryption for maximum protection. Moneyinfo have over 100	
	security policies, procedures, and controls. Moneyinfo have adopted a security policy in line	
	with ISO27001, an international standard that describes best practice for an ISMS (Information	
	Security Management System and ISO27002, a supplementary standard that focuses on the	
	information security controls that they implement. Their security measures include Data	
	Centre Security, Data Encryption, Network Security, Access Control, Backups, Vulnerability	
	Scanning, Intruder Alerts and Penetration Tests, Computer Security, Information Security Incident Management, Business Continuity Plan and Disaster Recovery. Full due diligence pack available on request.	
	Crunch Accounting: Online business accounting solutions designed to assist SMEs with a service	
	& support that suits a 21 <sup>st</sup> century practice including a dedicated service and accountancy team, annual business health check and business protection insurance.	
	Docusign: Allows us to create and generate documents requiring an electronic signature, to	
	allow clients and us to, act on, and manage agreements in an efficient manner. Powered by Docusign these documents are secure and signed by the client and we also offer integration within PFP. Clients can be automatically reminded that there are documents for them to sign within PFP. All signed documents are immediately stored back within IO.	
	Mailock by Beyond Encryption: Due to an alarming rise in Cybercrime activity, we consider it	
	necessary to implement increased security around our email communications. We have, therefore, taken the decision to adopt a secure email system called Mailock from Beyond	
	Encryption. Any Mailock secure emails we send to client's will be encrypted which will protect both the content and any attachments. The system also requires verification of our client's	
	identity which ensures that only they can access the email content and any attachments. We will verify our client's identity, maybe using a question and answer that we have shared, or	
	using a code sent by SMS to their mobile phone. Once they have successfully answered the	
	question or input the code, they will be able to simply read the message. Not only that but,	
	with a very simple registration process, our client can reply to us completely free of charge and securely. Once a client registers and replies we all become part of our "secure community" and	
	our client will no longer be required to answer an identity challenge to open any subsequent	
	secure emails as their identity will have been verified. Beyond Encryption's Mailock <sup>®</sup> product,	



uniquely addresses critical risks associated with email communication, affording the sender unprecedented levels of control, including identity verification, ensuring emails, and any attachments can only be opened and viewed by the intended recipient. Built on unique 'Identity Secured Communication' technology, Mailock<sup>®</sup> seamlessly integrates with our existing systems assuring that the recipient has securely received and opened our message. Adheres to ISO 27001:2013 Certification and Cyber Essentials Plus registration criteria for data security.

**Adviser Asset:** Provide a range of wealth planning comparison tools that support charge comparisons, switching/consolidation, platform due diligence and cash flow planning. The tools integrate with each other, and now also integrate with Intelliflo. The tools are capable of aggregating assets across multiple wrappers, rather than being constrained by the product silos that used to exist pre-platform world.

**LangCat Analyser:** Analyser helps us research and conduct due diligence. Backed by the lang cat's incomparable market insight and market-leading platform database, Analyser puts suitability front and centre and gives a perfect audit trail of every decision we take. It's fast. It's accurate. It's independent and it now covers platforms and MPS.

**Voyant:** Voyant helps advisers and clients plan and adapt to real life events, before, during and after they happen. It is interactive, easy to use, and collaborative, meaning advisers and clients can work together to make smarter, more tangible financial decisions. With Voyant, we get all the information we need to answer every "what-if" scenario. Offers two-way encryption to ensure client data is secure and safe.

**ADOBE Acropro:** Brings an all-digital document experience to our firm so we can deliver communications to our client in easy-to-read formats.

**MoneyAlive:** An interactive & impartial client video experience that breaks down topics so our clients can learn at a pace to suit them and underscores our client centric approach and brand values.

**Deposit Sense:** An effective cash management portal to help our clients maximise interest rates and protect their savings all year round. Client access is possible too.

**Timeline Risk Profiler:** Psychometric questionnaire that lets us identify our client's attitude to risk. Helping us to communicate investment risk in several ways, using visuals, illustrations, and descriptions.

**Smart Search:** The 2002 Proceeds of Crime Act led to the FCA enforcing legislation in place from the HM Treasury, this requires advisers to ensure that all clients they deal with are not on the financial sanctions list and provide an audit trail to demonstrate this process has taken place. SanctionsSearch.com will undertake this FCA requirement on our behalf, maintain a permanent search on each of our clients so they will be flagged if their name is subsequently added and provide a reliable audit trail for each record.

**Financial Analytics:** A powerful and award-winning tool that combines genuinely comprehensive fund data with market-leading analysis. A one stop tool for all our investment research and analysis, portfolio construction, due diligence, and ongoing monitoring.

**Office 365 Business Premium:** Word, Excel, PowerPoint, and Outlook. It also provides powerful services like business-class email, online storage, and teamwork solutions that can be accessed from anywhere.



**Genovo:** A comprehensive solution enabling us to write suitability reports or MiFID II-friendly review reports for private, corporate and trustee clients covering an extensive range of financial products and advice scenarios. They encrypt all our and our clients' personal information using state of the art encryption algorithms to protect against a breach to our clients' or our personal data held within the Genovo application. Genovo has also been awarded an A grade encryption quality from Qualys SSL labs. In addition to this, everyone on the Genovo team has signed a confidentiality agreement meaning they are committed to keeping all personal data safe and secure.

**Papercloud:** A user-friendly document management system, with client portal to share encrypted data and documentation. Data held in hosted cloud storage is secured and backed up every 15 minutes across geographically separate locations underpinned by Microsoft's Azure platform. Access to unlimited data live across the Internet using a web browser. Scan, virtual print, upload files with desktop applications. Prevention of unauthorised access; logon is made via a user's email address and strong password combination, unique to each user. Data in transit utilises HTTPS, SSL & TLS1.2. Data at rest is stored in a proprietary format. Third party penetration testing is performed with regular updates. ISO 27001 Information Security Policy.

**Constant Contact:** Email marketing software helping our business to stay in touch with our clients. The security of their site is managed on multiple levels, including Physical, Network, Host, Software, and User Account Security.

**Lifequote:** the UK's specialist Protection Portal and Administration Service. We know that too many people in the UK lack the insurance they need to protect them from devastating life events, so Lifequote have been providing advisers with comprehensive administration and new business support services since 2001. Their service is designed to improve efficiency, saving our clients and us valuable time. The LifeQuote Portal provides leading-edge software that supports the application process at every stage with pre-sale research and a wide range of quoting options. Lifequote provide us with comparative menu-based quotes for Life, Critical Illness, and Income Protection, but also comprehensive Business Protection, Relevant Life, Family Income Benefit and Whole of Life quotes. All with a clear research output, providing us with a seamless compliance trail. Lifequote has a simple application process including a Medical Tele-Interview that makes the application process easier for clients, comprehensive and with confidential medical disclosure. Lifequote allows us to track cases from different insurers in one place. Also, to save time, they offer us a Decision in Principle function that indicates expected terms before a policy is submitted.

**AYOA Mind Mapping:** Sometimes referred to as a brainstorm or spider diagram, a Mind Map is a visual thinking tool used to capture information and ideas. Mind Maps have been proven to boost productivity, creativity, and memory. A Mind Map begins with a Central Idea (the topic to be explored) and branches out into Key Themes and further development of ideas that radiate from the centre out. We use this to capture several aspects of our clients' lives including values, goals, relationships, interests, assets, liabilities, income, expenditure, advisers, and processes. Also used to create action plans for our clients.

**Go Proposal:** Streamlined proposal and fee review tool developed for accountants and adapted by Thanks Wealth Planning, the 1<sup>st</sup> Wealth Planning firm to develop its use for Wealth Planning clients. We understand that our clients value certainty. We subscribe to a set of beliefs and values which underpins our commitment to maximising the value we provide to our clients. In communicating that value, we have developed a modular service and pricing structure using Go Proposal, accountancy software. Our clients know exactly what service they are getting and what price they are paying in a clear and transparent way. Proposals for ad hoc work and ongoing services are created in a matter of minutes and delivered in real time. Collaboratively



our clients and we create a service and pricing structure that is tailored to their circumstances and needs.

**Timeline:** Timelineapp unleashes decades of empirical data and research to help bring our client's retirement journey to life and supports our Withdrawal Policy Statement and Centralised Retirement Proposition. Timeline transforms extensive, empirical asset class and longevity data into a visually dynamic, easy-to-understand story for our clients. Their story. We can demonstrate the impact of asset allocation, rebalancing, glidepaths, fees, and taxes, use interactive fire-drills to prepare clients for market declines, illustrate longevity risk and show our clients the probability of outliving their portfolio. Visually dynamic, we craft a personalised investment and/or withdrawal policy statement for clients within minutes.

Zoom/Microsoft Teams/Google Hangouts/Skype: Virtual meeting capability with our clients.

Fireflies.ai: Voice meeting notes to enable us to record client meetings if our clients agree.

**Section D:** They have supported us to create, launch, and establish our brand and marketing campaigns. They helped us to build a comprehensive brand toolkit so we can continue to evolve our brand in-house.

**KryptoKloud:** Provide cyber security intelligence and monitoring services inc. GDPR compliance monitoring. From their Cyber Intelligence Centre (CIC) they operationalise their cyber monitoring offerings which aligns technology and human analysts to best protect us from the ever-increasing digital threat.

KryptoKloud monitors for "digital risks" not only at the boundary of our organisation but beyond, identifying cyber threats, data leakage and any reputational risk. They utilise best-ofbreed cyber security solutions to bring cyber resilience to organisations of all sizes. To achieve this, they partner with leading cyber security technology vendors such as Symantec, F-Secure, Evidence Talks Limited and PhishingTackle to ensure they fulfil their mission of "Monitor, Detect, Prevent & Protect".

**Remedy IT:** Provide us with day-to-day IT support tailored specifically for small businesses like ours.

**Plan Works:** Provide us with a comprehensive suite of services and reports; administrative and technical support; research and analysis; up to date industry knowledge and strategic input and ideas.

Client Management Clients	We will offer clients independent wealth planning consultancy services and arrangement services in pensions, investments, and protection-based products.
	We have around 42 clients individual, couples and families that subscribed to regular ongoing services. Our ongoing service clients ages range from around age 40 to 85 and our transactional clients range from age 20-60. Typical client net worth is around £1m to £10m, with investable assets starting at around £500,000 although as a fixed fee advisory firm this is not a pre-requisite. Advice for existing clients' centres mostly around retirement planning needs with around a 29/71 split between accumulation clients and those that have retired. Around 20-30% of the 42 clients we work with have Inheritance Tax needs that they wish to resolve. Of the 42 clients around 30% have protection needs.



Maintaining Contact	<ul> <li>We are introduced to new clients from existing client and professional introducer referrals but also through social media marketing using Vouchedfor and personal connections. It is expected that the business will attract around 12-15 new clients per year from around 40-50 new enquiries per annum. To maintain service standards, we will continually monitor the number of clients we act for compared to the service standards we deliver. Our main priority will always be to ensure our service standards are maintained for existing clients.</li> <li>We also have approximately 16 clients who receive a 'transactional' service which provides wealth planning advice or services on a requested pay as you go basis.</li> <li>This is principally achieved through the issue of.</li> <li>Financial education articles</li> <li>Annual face to face meetings</li> <li>Virtual meeting</li> <li>Newsletters and e-shots</li> <li>Accessing to their own MyThanks App</li> <li>Updates on data protection and regulation</li> <li>Client liaison throughout the year by email, phone, and face to face</li> </ul>		
	-	vocate full transparency and encourage all forms of	
Source of new	open communication and client dialogue. Existing client referrals	73%	
clients	Existing client referrais	/3/0	
chents	Professional introductions	10%	
Recurring	Other (including internet enquiries, social media, networking)	17%	
Income vs	We currently receive 75% of our income from ongoing retained clients and 25% of our income		
New Business	from new client income.		
Income	WEAL	TH PLANNING	
Client	Please refer to:		
Reviews/	https://www.vouchedfor.co.uk/financial-advisor-ifa/hoxton/027680-sam-whybrow		
Testimonials			



RemunerationWe offer competitive, non-contingent fixed pricing, that puts more money in our client's<br/>pocket. We recognise the detrimental effect of compounded ongoing percentage-based fees<br/>and how it significantly shrinks our client's financial growth and quality of life.

In some cases, we may charge based on the time spent providing advice, known as an hourly rate. Our standard rates are £200 per hour for financial advice, £125 per hour for paraplanning, and £75 per hour for administration. We will let you know if VAT applies before charging any fee, but it is often exempt since we always act as intermediaries.

Our clients can choose to pay fees directly or through Adviser Charging, depending on the product provider recommended. We transparently outline the cost of each stage in our process, which typically involves four main stages: diagnostic, recommendation, implementation, and progress planning. Each stage is distinct, and our clients have the flexibility to terminate the process if needed. Refer to our process.

For recommendations made following our Personal Liability Analysis (protection), we prefer fixed fees. If our recommendation leads to a product being implemented our clients will be informed of any commission, we receive before proceeding. It is the only advice area still offering commission. Keep in mind that if our client stops paying premiums within the clawback period, the provider will reclaim a portion of the commission, for which our client will need to reimburse us. Working on a fixed fee basis avoids this issue. We waive or offset our commission, potentially securing lower premiums for our clients and long-term cost savings.

This due diligence document has been provided in good faith and is to be treated in the strictest confidence.