

PREMIER SIPP KEY FEATURES

JLT PREMIER PENSIONS



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IMPORTANT NOTE

JLT Benefit Solutions trading as JLT Premier Pensions cannot provide you with investment advice in relation to your specific circumstances and the suitability of a SIPP for retirement planning.

These key features explain the main characteristics and potential benefits of the Premier SIPP. The terms Premier SIPP used throughout this document is a generic description for the two separate schemes administered by JLT Premier Pensions. The schemes are the Premier SIPP and the Premier Self Invested Personal Pension.

The Premier SIPP is not a stakeholder pension scheme. If you do not require the flexibility offered by a SIPP a personal pension scheme may be more appropriate for you.

The added flexibility of the SIPP might result in charges that are higher than some other pension products such as a personal pension scheme or stakeholder pension scheme and you should satisfy yourself that these added benefits are relevant to your circumstances.

If you are unsure whether a SIPP is suitable for you then you should seek advice from an Independent Financial Adviser.

If you do not have one then for details of your nearest Financial Adviser please contact FA Promotion on 0330 1000 755 or visit www.unbiased.co.uk.

ABOUT US

The Financial Conduct Authority requires us, JLT Benefit Solutions Limited, to give you this important information to help you to decide whether a SIPP is right for you. You should read this document carefully so that you understand the product and then keep it safe for future reference.

This document is based upon our understanding and interpretation of current legislation which may change in the future. It should not be relied upon for financial advice, detailed advice for an individual, or as legal advice. The taxation of benefits that you may be entitled to in the future can change.

KEY FEATURES OF THE PREMIER SIPP

Introduction

These key features explain the main characteristics and potential benefits of the Premier SIPP. If you have any questions about any information in this document, please contact your financial adviser, or contact JLT Premier Pensions directly.

The Premier SIPP is a personal pension scheme, and is generally suitable for individuals who are employed or self-employed. It is a suitable pension planning vehicle for individuals who want to diversify their investments outside of the usual range offered by a traditional personal pension. There are additional costs associated with the Premier SIPP.

The Premier SIPP differs from a conventional pension plan because it can give you more control and flexibility. You or your adviser (where investment decisions are delegated), can direct where the funds are to be invested, provided it is in accordance with the investment mandate approved by JLT Benefit Solutions Limited.

A SIPP, like other registered pension arrangements, is generally a long-term savings vehicle.

It's Aims

The Premier SIPP aims to provide you with the following:

- A tax-efficient way to save for your retirement, as your fund is usually free from income tax and capital gains tax;

- A wide range of investment options;
- The ability for you to make your own investment decisions;
- The provision of a pension that is flexible in meeting your changing needs and personal circumstances;
- A wide range of options at retirement, including drawing income from your fund, purchasing an annuity and even to phase your retirement by taking benefits in stages;
- Direct access to dedicated, experienced administrators and technical staff.

Your Commitment

There is no commitment on your part to make a regular contribution. Contributions can be started and stopped at any point in time. Subject to acceptance, you can also arrange for transfers of your existing pension benefits into the Premier SIPP.

Fees will be chargeable irrespective of whether contributions are paid. These fees can be paid from the fund or personally.

Risk Factors

- In normal circumstances benefits can only be paid out from age 55. In some exceptional circumstances, such as ill health or incapacity, benefits may be paid an earlier age.
- The value of investments within the Premier SIPP may go up or down.

- The value of your pension fund at retirement is not guaranteed and will depend on the performance of your investments.
- By transferring from or into another pension plan, you will incur transfer fees. The other provider may also levy their own charges.
- Transaction charges are payable. The excessive switching of investments or low value transactions may erode the value of your fund.
- You will not receive a recommendation from us concerning either the SIPP or investments held within it. JLT Benefit Solutions Limited and the Trustee Company will not accept any responsibility for poor investment performance or mis-selling. If you are unsure whether the SIPP or specified investments within it are suitable for you, you should consult a Financial Adviser.
- Changes to tax rates, reliefs and allowances in the future may affect the amount of benefit that you receive when you retire.
- Benefits may be lower for a number of reasons:
 - Lower than expected interest or annuity rates;
 - Lower than expected investment returns, or capital growth;
 - Cessation of contributions;
 - Increases in charges or investment costs;
 - Drawing benefits earlier than anticipated at outset.
- Values of investments, such as commercial property or unlisted shares, are subject to the opinion and judgment of third parties, and you might not obtain those values in the event of a sale.
- Some investments, such as property, can take far longer to sell than other investments, and you may not be able to sell them at the time you wish to.
- Where borrowing is undertaken by the SIPP, repayments will need to be made even investment income ceases. Failure to maintain repayments will put your SIPP assets at risk.
- Our charges may increase, although this will be communicated to you in writing prior to this happening.
- If you transfer from a defined benefit pension arrangement to your SIPP, the pension benefits you receive may not be as great as they could have been had you stayed a member of the scheme from which you are transferring, and in addition you may be giving up other valuable scheme benefits such as life assurance cover or guaranteed benefits. We will not accept transfers from schemes with guaranteed benefits unless you have taken independent financial advice.

Fees and Charges

Fees relating to the establishment of your Premier SIPP, annual administration and other transactional charges, will be collected from your Premier SIPP bank account in accordance with our published Terms and Conditions document. A copy of this will be supplied with any Premier SIPP application pack issued, and is also available on request.

Additional fees may be charged by other parties for activities undertaken within the SIPP.

Cancellation Rights

Individuals will be provided with a Right to Cancel their application. The duration of the Right to Cancel will be 30 days from receipt of the Right to Cancel documentation. Any Right to Cancel notice must be returned to the address for JLT Premier Pensions provided in the 'Contact Us'

QUESTIONS AND ANSWERS

CONTRIBUTIONS

How do I start the scheme?

The Premier SIPP can be started by regular or single contributions or with a transfer payment from another registered pension scheme. The contributions to the scheme can be made either by you as the individual member, your employer or in some cases by a third party.

A designated bank account will be set up to handle the contributions into the plan and will be opened with the Bank of Scotland.

Any contribution paid into the SIPP bank account will remain there until you instruct the Trustee to invest the money elsewhere on your behalf. Income from other investments such as dividends or rent received by the scheme, will also be paid into this account.

How much should be contributed?

There are no minimum or maximum contribution levels associated with the Premier SIPP. Essentially the amount of contribution paid will depend on your future needs and in particular the level of income you would like in retirement.

How much can be contributed?

When making personal contributions, tax relief is limited to the greater of 100% of earned income, or £3,600. These limits are also subject to the Annual Allowance.

What is the Annual Allowance?

The Annual Allowance is currently set at £40,000 (gross). However, as soon as you first flexibly access your benefits and take income, your annual allowance will reduce to £4,000 (gross).

In addition, the annual allowance reduces for those whose income is above HMRC's adjusted income level on a sliding scale from £40,000 down to £4,000

Contributions in excess of the 'Annual Allowance' will cause you to suffer a tax charge depending on your individual circumstances.

How is tax relief on my contributions claimed?

Basic rate tax relief will be reclaimed from HM Revenue & Customs by the SIPP under the relief at source (RAS)

rules. This means your entitlement to basic rate tax relief will be credited to the pension scheme. Your higher rate relief is reclaimed by completing a self assessment return.

Can my employer make contributions?

Your employer can pay contributions to your SIPP and these will normally be entitled to corporation tax relief. The contributions must satisfy the requirement that they are 'wholly and exclusively' for business purposes. This is likely to be a matter for agreement with the local Inspector of Taxes.

Can I contribute my Tax-Free Cash?

Under anti-avoidance legislation tax free lump sum payments from registered pension schemes cannot be used to finance additional tax-deductible pension contributions – this is known as "recycling".

Carry Forward

It is possible to carry forward any unused Annual Allowance from the previous three tax years to the current tax year. Depending on your circumstances this may allow you to make a contribution greater than the annual allowance in the tax year.

IMPORTANT NOTE

Once your Annual Allowance has reduced to £4,000 (gross), as a result of flexibly accessing your pension benefits and taking your first income payment, you can no longer use carry forward to justify larger contributions.

TRANSFERS

Can I transfer other pension arrangements into my SIPP?

It will be possible to transfer benefits from other registered pension schemes into the Premier SIPP. Normally, these benefits will be transferred in the form of cash directly into the SIPP bank account.

In some instances, it will be possible to transfer assets 'in specie' from other pension arrangements into the Premier SIPP. For example, the transfer of commercial

An 'in specie' transfer will involve re-registering the registered holding so that it is owned and controlled by

the Trustee and Member of the Premier SIPP. It may not always be possible to make such transfers and it is worth obtaining confirmation from the transferring pension provider that the transfer of the asset itself is possible.

Please refer to the important note if the transfer is from a defined benefit occupational scheme.

Can I change my mind?

You will be provided with cancellation rights for each transfer you make. This lasts for 30 days from the date you receive the Transfer In Cancellation Notice, which we will send you after we receive the signed discharge forms relating to the transfer. If you elect to cancel the transfer there is no guarantee that the monies can be returned to your previous scheme, and you may have to make alternative arrangements for a new policy to receive these monies.

If the transfer value has already been invested when you decide to cancel, it may be lower than the amount originally received, in which case you will receive less than you originally transferred.

You will also incur transfer in costs as set out in the Premier SIPP Terms and Conditions and investment transaction costs may also be incurred. Please contact us if you would like further information regarding your right to cancel a transfer to your Premier SIPP. We recommend you seek independent financial advice.

IMPORTANT NOTE

Transferring benefits is a complex issue and a number of factors should be considered and discussed with a Financial Adviser before the transfer goes ahead, whether to, or from, your Premier SIPP.

The Financial Conduct Authority have a section on their website to provide additional information to consumers in relation to pension transfers at 'www.fca.org.uk/consumers/pension-transfer'. If you would like a printed copy of this please contact JLT Premier Pensions.

We will not accept transfers from Defined Benefit occupational schemes without you receiving advice.

Can I transfer my pension benefits away?

You can transfer your benefits out to another registered pension scheme or a qualifying recognised overseas pension scheme (QROPS). As a SIPP may have a

number of different types of assets held, these assets may not be transferable to another scheme without being surrendered or sold first. You will need to contact us should you wish to transfer your benefits to another registered pension scheme.

Transfers away from your Premier SIPP will incur costs which will be deducted from your fund prior to your transfer being made.

THE LIFETIME ALLOWANCE

What is the Lifetime Allowance?

The Lifetime Allowance is the level up to which you as an individual can build pension funds without triggering certain tax charges.

As long as the aggregate value of all your pension arrangements remains below the Lifetime Allowance the normal tax treatments will apply. Where aggregate benefits exceed the Lifetime Allowance there will generally be a recovery tax charge of either 55% or 25% of the excess amount depending on how you take those benefits.

When is the Lifetime Allowance checked?

The Lifetime Allowance will be checked, or tested, when a 'Benefit Crystallisation Event' occurs. This is normally on retirement or death – i.e. when benefits 'crystallise' and are paid out from the SIPP.

It is not necessary to draw all of your pension benefits at one time. It is possible to draw pension benefits on a 'phased' basis. Anyone who chooses to draw benefits on a phased basis will be tested against the Lifetime Allowance each time any benefits are brought into payment.

How much is the Lifetime Allowance?

Lifetime Allowance is currently set at £1,073,100 for the 2020/2021 tax year.

What amount is tested?

For the purpose of testing benefits from the Premier SIPP against the Lifetime Allowance, the amount will be the market value of the overall pension fund that has been crystallised, or the amount transferred to a qualifying recognised overseas pension scheme.

Where the pension income is being paid under the drawdown rules, the annual level of the pension will be deemed to be the maximum permitted annual income, even if the member is taking a lower amount of income

What happens if the fund is greater than the Lifetime Allowance?

Generally, if the value of benefits coming into payment exceed your available Lifetime Allowance then the excess can either: be taken as a lump sum payment, in which case a tax charge of 55% will be applied to the excess; or be taken as annual income, in which case the excess will be subject to a 25% tax charge and the income will be subject to income tax at your marginal rate of income tax.

DRAWING BENEFITS FROM YOUR PREMIER SIPP

When can I take my benefits?

Your benefits can come into payment from age 55 onwards.

You can also start to draw benefits without actually retiring from your current employment. It will therefore be possible for you to receive a pension whilst continuing to work.

Can I take Tax Free Cash?

When you take your benefits up to 25% of the fund value can normally be taken as a tax-free lump sum as long as the total fund value does not exceed your available Lifetime Allowance.

Tax-free cash is not available if you have used up all your Lifetime Allowance entitlement.

What are my pension income options?

You have the following options at retirement:

- Flexi-Access Drawdown Pension;
- Uncrystallised Funds Pension Lump Sum;
- Purchase a Lifetime Annuity;
- A combination of these options.

You may wish to consider these proposals and seek financial advice before taking an income or purchasing an annuity.

What is Flexi-Access Drawdown Pension?

As an alternative to purchasing an annuity, the Premier SIPP allows you to draw an income directly from the SIPP fund and this is known as flexi-access drawdown. Payments received under this option are withdrawals of capital from the pension fund and may reduce the amount eventually available to purchase an annuity.

There are no limits on the amount of income that you can take from flexi-access drawdown funds. You can take as much or as little as you wish and as often as you want. The income taken is taxed at your marginal rate through Pay As You Earn (PAYE).

What is an Uncrystallised Funds Pension Lump Sum (UFPLS)?

This is a form of flexible drawdown where you designate just the amount of income that you want to receive gross. The income received is paid as one amount and 25% of it is paid tax free. The remaining 75% is taxed at your marginal tax rate. A series of UFPLS payments can be made, but they all need to satisfy the following conditions:

- You have reached the age of 55 or you are retiring due to ill health;
- You have uncrystallised funds available;
- You have a tax free lump sum entitlement which must be 25% of the fund;
- You must have the available Lifetime Allowance.

What is Phased Retirement?

You may not want to take all your pension benefits at once. The Premier SIPP allows you to take some tax free cash and make income withdrawals or buy an annuity at different times. You can use all or part of the fund to do this. This process is known as "Phased Retirement".

What is Annuity Purchase?

You can use all or part of your fund to purchase an annuity through the open market option. In these circumstances we will pay you a tax free cash with the balance of the fund used to purchase an annuity with an insurance company. There are a number of options that can be chosen when purchasing an annuity for example in relation to when it is paid, how it increases over time, guarantee periods and benefits on death for a spouse or dependant.

The amount of income received depends on the size of your pension fund, your age, the options chosen and the annuity rates available to you. There may also be enhanced terms depending on your state of health. You should seek financial advice before purchasing an annuity.

Is my income taxed?

Any drawdown pension income and/or annuity payments will be taxed as earned income. They are added to your total income to determine your personal tax liability. Tax is deducted from your income or annuity before it is paid.

You should seek financial advice before deciding how you would like to take your benefits.

Can I change my mind?

You will be provided with a right to cancel the first time that you enter into a drawdown pension or UFPLS arrangement. This gives you the right to cancel your election to take benefits, and lasts for 30 days from the date you receive your Drawdown Pension Cancellation Notice, which we will send to you around the time you receive your first payment. This includes the Pension Commencement Lump Sum (tax-free cash).

If you elect to cancel your drawdown pension, you will need to return all payments to your SIPP. There is no guarantee that they can be re-invested in the same manner as they existed prior to you drawing benefits. For example, the capital may not be able to be re-invested into the same funds from which they originated and that the funds withdrawn will not benefit from any market movements during the period in which they have been taken out of the market. In addition, you will incur drawdown pension fees as set out in the Premier SIPP Terms and Conditions and investment transaction costs may also be incurred.

Please contact us if you would like further information regarding your right to cancel your first income withdrawal. We recommend you seek advice from a Financial Adviser.

There is no right to cancel income withdrawal in the case of a transfer to the Premier SIPP of a policy which was already in income withdrawal prior to the transfer.

Pay As You Earn (PAYE)

If you decide to draw an income from your Premier SIPP, we will deal with the deduction of tax under the PAYE rules and arrange the payment of the net pension to you.

DEATH BENEFITS UNDER THE PREMIER SIPP

Death Benefits: Lump Sum Payments

If you die before reaching the age of 75, your beneficiaries can receive a lump sum to the full value of your fund. Provided the lump sum is paid within two years no tax charges will apply. If the payment is made outside of two years or you were 75 or over at the time of death, then it will be subject to a tax charge.

This tax charge will be the beneficiary's marginal tax rate or 45% if the payment is paid to an external trust.

If your funds are uncrystallised at the time of death, the lump sum payment will be tested against the Lifetime Allowance applicable at the time.

Death lump sum payments are made at the Trustee Company's discretion, but consideration will be given to any person or persons you have nominated to receive such benefits. The nomination form is attached to your application to join the Premier SIPP or a copy can be requested from us at anytime.

Will this be subject to Inheritance Tax?

If it is paid at the Trustees' discretion to beneficiaries then it will normally be free of inheritance tax.

Death Benefits: Flexi-Access Drawdown for the Beneficiary?

Alternatively, your fund can be inherited by a beneficiary and used to provide income to them. If you were under the age of 75 at the time of death, the income will be paid to your beneficiaries tax free. If you die after age 75 payments will be subject to the beneficiary's marginal tax rate.

If any of your funds are uncrystallised at the time of your death, your beneficiaries must designate them into flexi-access drawdown within two years, otherwise tax charges may apply. At the time of designation they are subject to a lifetime allowance test and any excess will be taxed from the beneficiaries funds.

Where there are no nominated beneficiaries, the remaining funds can be given tax-free to a registered charity that you have nominated

A beneficiary of your funds will in turn be able to nominate "successors" to receive these inherited benefits. These benefits can be passed down from successor to successor in the event of their deaths.

How do I nominate Beneficiaries?

There are two ways of naming in advance who you wish to receive the lump sum benefits payable on death:

- 1 You can nominate beneficiaries by completing a form included in the application. Any nomination they make will act as a guide for the Trustee when making lump sum payments under the SIPP. The nomination can be changed at any time. The nomination is for the guidance of the Trustees and is not legally binding.
- 2 The members can potentially (at the application stage) set up their own individual trust so the money from the Premier SIPP is paid to these Trustees, who are responsible for distributing the funds to the beneficiaries. The Trustee will be responsible for making payment to the dependants and beneficiaries of your SIPP. In order to ensure that there is no fluctuation in the value of the Scheme, assets will be encashed or sold and retained as cash amounts in the designated SIPP Bank Account.

What happens to the assets of the SIPP when I die?

Where property or other non-realizable assets are held, such as unlisted shares, the Trustee will not look to encash these immediately, and the assets will continue to be held until a decision is made concerning payment of benefits.

INVESTMENTS

What can the scheme invest in?

The value of your Premier SIPP will depend directly on investment performance, how much you contribute and any costs relating to the underlying investments.

The Premier SIPP gives you greater flexibility to manage the scheme's investments or to appoint your own investment manager; unlike an insured scheme where the financial institution providing the contract also provides the funds available for investment.

The assets making up the pension fund are co-owned by you and the Trustee Company but it is still your decision where the SIPP money is invested.

What types of investment are allowed?

The Premier SIPP offers a full range of investments subject to the prior approval by JLT Benefit Solutions Limited, who will take into account HMRC and FCA rules.

These investments include:

- Commercial property or land;
- Agricultural land;
- Borrowing to finance the purchase of property, or to undertake any legitimate transaction as allowed by the Scheme rules;
- Loans to an unconnected third party;
- Managed funds and unit linked funds provided by insurance companies;
- Unit trusts, investment trusts and open ended investment companies (OEICS);
- Stock and shares - whether quoted on the London Stock Exchange, for example, or on other stock exchanges based in the UK or overseas;
- Shares in unconnected unlisted companies;
- Bank and building society deposits.

The Trustee reserve the right to reject any investments they deem not to be appropriate.

Financial Advice

JLT Benefit Solutions Limited do not give advice on the investments held within the Premier SIPP. When arranging for you to make investments, we are not required to assess the suitability of the particular investment or service being offered or provided for your personal circumstances. Therefore you will not benefit from the protection of the Financial Conduct Authority rules on assessing suitability.

We will not assess whether:

- the relevant product or service meets your investment objectives;
- you would be able financially to bear the risk of any loss that the product or service may cause;
- you have the necessary knowledge and experience to understand the risks involved.

If you do not have a Financial Adviser, there may be circumstances in which the Financial Conduct Authority rules require us to assess the appropriateness of the selected investment. If this is the case we will contact you to request additional information. We reserve the right to make additional charges for undertaking this appropriateness check.

There are just a few restrictions that will apply in relation to investments to ensure compliance with HM Revenue & Customs rules and these cannot be ignored. Some of the guidelines are noted below:

Property Purchase

Essentially, there can be no residential element to property. Certain types of property continue to be classed as commercial, such as hotels and care homes, but there are strict guidelines relating to the member's use of such property.

Borrowing

Borrowing is limited to 50% of the net assets of the pension scheme.

Loans

Loans to SIPP members or their businesses are prohibited. In limited circumstances the SIPP Trustee will on request consider a proposal to make a loan to an unconnected third party but are within its rights to decline.

Unlisted Shares

Not all unlisted share purchases will be allowable and each proposal will be considered in light of HMRC taxable property rules and FCA requirements. The investment will not be permitted if tax charges will arise. The final decision will rest with the Trustee Company.

Can I transact with connected parties?

Transactions will be allowed with connected parties. It will be necessary however to ensure that all such investments are acquired, disposed of or leased on commercial, arm's length terms.

ROLES AND RESPONSIBILITIES

Roles with the Premier SIPP

Personal Pension Trustees Limited is the Trustee who acts as bare trustee for the purposes of holding the assets under the Premier SIPP.

JLT Benefit Solutions Limited is the Scheme Administrator and Operator of the Premier SIPP. It is authorised and regulated by the Financial Conduct Authority (Firm Reference Number 407903).

JLT Benefit Solutions Limited and Personal Pension Trustees Limited are part of the Marsh and McLennan group of companies. Registered office: The St Botolph Building, 138 Houndsditch, London EC3A 7AW. Registered in England No 01782357.

JLT Premier Pensions is a trading name of JLT Benefit Solutions Limited.

If you wish to contact the Trustee Company or JLT Premier Pensions, please use the contact address and telephone number given on page 11.

Scheme Administrator

The Premier SIPP is a 'Registered Pension Scheme' and JLT Benefit Solutions Limited is the Scheme Administrator responsible to HM Revenue & Customs.

OTHER INFORMATION

How are complaints dealt with?

We treat all customers concerns seriously. In the unlikely event that you have a complaint about the service you have received, please contact the Compliance Officer, in writing:

Customer Relations Team
JLT Premier Pensions
JLT Benefit Solutions Limited
Central Court
1b Knoll Rise
Orpington Kent, BR6 0JA

Details of our complaint handling procedures are available on request. If you are not happy with the way in which your complaint is handled, or are unable to obtain a satisfactory resolution, you can contact the Pensions Advisory Service who are available to assist members and beneficiaries of pension schemes in connection with any difficulties which have not been resolved by us. They can be contacted at:

Pensions Advisory Service
11 Belgrave Road London SW1V 1RB Tel: 0845 601 2923
Fax: 020 7233 8016

In certain circumstances you may have a right to have your case reviewed by the Financial Ombudsman Service. If this is the case we will tell you and you can contact them on:

Financial Ombudsman Service
South Quay Plaza
183 Marsh Wall
London E14 9SR
Tel : 020 7796 0016

All the above does not prevent you from taking legal proceedings later.

Financial Services Compensation Scheme

The Premier SIPP is covered by the Financial Services Compensation Scheme (FSCS). You may be entitled to compensation under the scheme if Personal Pension Trustees Limited or JLT Premier Pensions are unable to meet their obligations. This depends on the type of business and the circumstances of the claim. Most types of investment business are covered for 100% of the first £50,000. However, funds held with third parties such as insurers, investment managers, or direct investments may not be covered under FSCS provision or may be subject to different levels of compensation.

In relation to the SIPP bank account and other cash deposit investments we have sought the guidance of FSCS and our understanding is that individual SIPP members will be protected up to £85,000. However, we do have to remind you that this limit could embrace any other accounts that you have with the same banking group outside of your SIPP.

This is not a definitive statement of the law but of our understanding of the extent of compensation based on discussions with FSCS.

Further information is available from FSCS at www.fscs.org.uk

Data Protection

We know how important privacy is to you, so we have created a Fair Processing Notice to provide you with a clear explanation of when, why and how we collect and use your personal data. A version of this notice can be obtained on the JLT website:
<http://www.jltemployeebenefits.com/your-data>

Applicable Law

The laws of England and Wales will apply to the Premier SIPP.

Communications

We will communicate with you in English; both verbally and in writing and we will only accept instructions and communications from you in the same way. We will accept instructions by email, but only where it is received from a pre-agreed email address. When emailing items to you we may also use encryption (a strong password) to protect your data. You will however remain liable for any misuse of the email address or passwords we share with you and any resultant loss or detriment incurred.

Client Classification

Under the Financial Conduct Authority's Conduct of Business Rules we classify all Members of a Premier SIPP as Retail clients.

Financial Conduct Authority

If you wish to contact the Financial Conduct Authority, their address is:

Financial Conduct Authority
25 The North Colonnade
Canary Wharf
London E14 5HS

We are required to have arrangements in place to manage conflicts of interest between ourselves and our clients and between our different clients.

We operate in accordance with conflicts of interest procedures that have been put in place for this purpose under which we have identified those situations in which there may be a conflict of interest, the steps by which such conflicts should be managed and where appropriate, the requirement to inform you of the nature of the conflict so that you can choose whether to continue to do business with JLT Benefit Solutions Limited. Should you require further information we will upon request provide you with our detailed Conflicts of Interest policy.

JLT PREMIER PENSIONS

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