

BTL TRACKER MORTGAGE WITH DISCOUNT FOR INITIAL PERIOD RANGE

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Our approach to meeting the Products & Services Outcome and Price & Value Outcome – Information for distributors of the Product.

This summary document is being provided to you to fulfil our responsibilities under PRIN 2A.4.15R and PRIN 2A.3.12 R (2).

It is designed to support you to comply with your responsibilities under PRIN 2A.3.16 R and PRIN 2A.4.16 R. Please note that you are ultimately responsible for meeting your obligations under 'The Consumer Duty'.

This information is intended for intermediary use only and should not be provided to customers.

1. Summary of our assessment

We have assessed that:

- Our BTL tracker mortgage product range continues to meet the needs, characteristics, and objectives of customers in the identified target market.
- The intended distribution strategy remains appropriate for the target market.
- The Product provides fair value to customers in the target market (i.e., the total benefits are proportionate to total costs).

2. Product characteristics & benefits

The Product is designed to meet the needs of the target group, most notably the need of single, joint or Limited Company borrowers to fund the purchase of a rental property. The Product features and criteria are designed to support these needs.

- A variable interest rate that is linked to a specified reference rate throughout its term. The margin above the reference rate is discounted by a fixed amount for an initial period.
- Mortgage Term up to 40 years
- Availability on new and existing homes
- The Product is targeted at applicants who want both a prompt lending decision and a personalised service.
- Manual underwriting is used so applicants can be considered irrespective of the complexity of their income including self-employed, multiple income sources, and contractors.
- Underwriter capacity is closely monitored to deliver a timely service to applicants. We aim to deliver a market leading level of service which forms one of the key planks of our proposition.
- Brokers can speak with knowledgeable and experienced staff within the Business Development Unit, underwriting teams. Additional support is given to brokers to ensure they understand our products and approach via our intermediary website, broker webinars and face to face meetings with our sales team to share insights and explain our products.

- Customers can also connect with us, via multiple communication channels. Call handling and wait times are monitored closely with resource redeployment to respond to peak demands. We recognise the time cost that customers experience when dealing with financial institutions, our approach limits this.

Full eligibility criteria can be accessed on our intermediary website via [BTL Lending Policy Search Tool](#) link.

3. Target market assessment and distribution strategy

This target market assessment matrix segments the target customers for the Product, recognising their different needs to enable you to tailor the services you provide when you distribute the Product.

Customer Circumstances	Distribution Strategy	Customer Needs & Objectives
<p>Customers looking for a BTL mortgage to fund the purchase of 100% of a property. The mortgage has a variable interest rate that is linked to a specified reference rate throughout its term. The margin above the reference rate is discounted by a fixed amount for an initial period</p>	<p>Available across our Intermediary channels.</p> <p>Applications can be through advised sale only.</p>	<ul style="list-style-type: none"> • Applicants looking to purchase a rental property outright e.g., initial purchase or remortgage. • Applicants who wish to let the property to long-term tenants and will not reside at the security address. • Applicants who value the advice of a regulated mortgage broker • Minimum age at submission 21yrs old. • Maximum age is 70 years at application. • Single or joint applicants (maximum of 2 applicants) or 4 directors if the application is for a limited company. • Applicants irrespective of complexity in their characteristics (e.g., self-employed, multiple income sources, contractors). • Applicants who want a variable payment rather than to lock into a fixed rate or to continue on a reversionary rate after the expiry of the fixed rate from a previous product. <p>Applicants who are prepared to pay a modest Early Repayment Charge if they want to redeem during the initial period in return for a discount in the variable rate they pay during this period.</p>

*Intermediary distribution through:

- Networks and their Appointed Representatives.
- Mortgage clubs.
- Directly authorised mortgage intermediaries.

All intermediaries must be registered with us.

The Product is not designed for customers:

- Requiring a Residential mortgage.
- Requiring a mortgage for a property that is to be rented in multiple parts, to multiple tenants or as a holiday let.
- In need of certainty of payment at all times or for at least an initial period.
- Applicants wanting complete flexibility and to be able to switch without an ERC.
- Who do not meet our lending or property criteria.

4. Customers with characteristics of vulnerability

The Product is designed for access across the residential market, and to be inclusive of the needs of customers in the target market with characteristics of vulnerability (other than financial vulnerabilities that are inconsistent with customers demonstrating the product is affordable at the point of application).

Given the long-term nature of the product, it is expected that a proportion of applicants may experience one or more periods of vulnerability during the life of the product, policy and procedures are in place to provide support.

This Product has been designed to be inclusive of all applicants that meet our credit criteria regardless of any vulnerabilities.

Processes are in place for distributors to notify us of any characteristics of vulnerability at the point of application. This includes communication needs which may require documents to be provided to applicants in large print or braille. Procedures are also in place to manage any vulnerabilities identified throughout the lifetime of the mortgage.

We considered the needs, characteristics, and objectives of customers with characteristics of vulnerability at all stages of the design process for this Product to ensure the Product meets their needs.

We have also tested the Product to assess whether it will meet the identified needs, characteristics, and objectives of the target market, including customers in the target market who have characteristics of vulnerability.

We have in place a framework to achieve good outcomes for vulnerable customers, which includes:

- Education and training for our staff to ensure they have the appropriate skills and experience to recognise and respond to the needs of vulnerable customers.
- Staff are required to complete annual vulnerability training.
- Suitable customer service provision and communications.
- Flexible policies, where appropriate, to support vulnerable customers.
- Monitoring to ensure we continue to meet and respond to the needs of customers with characteristics of vulnerability.

Intermediaries should continue to comply with your obligations to ensure that you treat customers in vulnerable circumstances fairly.

Please contact us if you need any further information about how we support the needs of all our customers in relation to the Product.

5. Our assessment of value

We have developed a comprehensive and robust assessment process which evaluates several aspects of our business to determine the value of our mortgage products. This analysis is used to ascertain whether the Product delivers fair value for customers.

The outcomes of the assessment process are presented to the Board, allowing for challenge and further investigation.

Our fair value assessment has considered the following:

Benefits	Price	Costs	Limitations
The range of features that the Product provides, the quality of the Product, the level of customer service that is provided and any other features that the Product may offer.	The interest rates, fees and charges customers pay for the Product, comparable market rates and non-financial costs associated with operating the Product.	The cost of funding the Product and any other reductions in costs to the customer made possible by economies of scale. The operational costs of delivering the product including the cost of manually underwriting each case, and the cost of delivering market leading service levels.	Limitations of the product are that there are currently no Further Advances or Porting options, (but whilst these are limitations, this is still a mass market with Kensington and other lenders offering remortgage solutions)

Results of our assessment

Our assessment concluded that the Product **continues to deliver fair value for customers in the target market for the Product.**