



## CONSUMER DUTY - FAIR VALUE ASSESSMENT - ADVICE

### **Our approach to meeting the Products & Services Outcome and Price & Value Outcome – Information for our Customers.**

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

It is designed to demonstrate that, since the introduction of FCA policy statement PS22/09 'A new Consumer Duty' we have considered the price and value of the products and services provided to consumers.

Price and value is defined as the relationship between the amount paid by a retail customer for the product and the benefits they can reasonably expect to get from the product, and a product provides fair value where the amount paid for the product is reasonable and relative to the benefits of the product.

'Product' when used in relation to fair value includes both products and services.

Manufacturer when used refers to product manufacturers of regulated products.

We have considered our fair value assessment following a review of services to consumers that has included areas such as:

- The appropriateness of our broker fee policy across the different consumer groups.
- The percentage of consumers who we have successfully secured a mortgage for.
- The percentage of consumers who have re-engaged with us following the end of their existing mortgage arrangement.
- The percentage of consumer complaints that are resolved without the involvement of the ombudsman services.
- The scope of our independence across products and manufacturers.

We are committed to periodically review our fair value assessment.

Mortgage Products - Distribution Services	
Fair Value Assessment Date:	17/04/2023
Expected Date Of Next Assessment:	04/2024
Fair Value Outcome:	Having conducted a fair value assessment we believe that the amount being paid by retail consumers for our products and services represents fair value and is relative to the benefits that our clients receive.
Products Distributed:	Fixed rate deals Tracker rate deals Variable rate deals Discounted rate deals Impaired credit deals.
Distribution Strategy:	The firm's distribution strategy is through our advisory services which include personal recommendations on a face-to-face and non face-to-face basis.
Distribution Arrangements:	No distribution arrangements are in place that impact negatively on the price a consumer is asked to pay for a product or service. Applications are only accepted on an advised basis.
Type Of Consumer For Whom The Products Would Be Unsuitable:	As per the manufacturer's information sheet.
Target Market:	Consumers falling within the following mortgage arrangement types: <ul style="list-style-type: none"> <li>• First time buyers</li> <li>• Standard residential</li> <li>• Consumer buy to let</li> <li>• Credit impaired</li> <li>• Equity release</li> <li>• 2<sup>nd</sup> charge</li> </ul>

	<ul style="list-style-type: none"> <li>• Second property</li> <li>• Self-build</li> <li>• Retirement interest only</li> <li>• Bridging</li> </ul> <p>Products being distributed are manufactured for either mass market or for narrower retail consumer needs such as consumers who are self-employed, contractors, or individuals with complex incomes. Products are only distributed to the target market set by the manufacturer.</p>
Product Benefits:	<p>Our products are designed to meet the needs of the target market, including those who need a little bit of flexibility and understanding with their cases.</p> <p>We also consider the product providers fair value assessments when making product recommendations.</p> <p>There are numerous channels through which clients can access us for support before, during and after the application process, including the ability to come in and see us on a face-to-face basis if required.</p>
1 <sup>st</sup> Charge Applications	<p>We typically charge a £399 Advice &amp; Arrangement Fee. This fee is charged regardless of 1<sup>st</sup> charge product type, so all clients are treated equally.</p> <p>This fee represents fair value for clients and is also charged for more niche areas like Commercial and Bridging.</p>
2 <sup>nd</sup> Charge Applications	<p>We will charge a £299 Advice &amp; Arrangement Fee, along with a Broker Completion Fee of between 1% (Minimum £500) and 4% (Maximum £2000). Our typical charge will be 4%.</p> <p>2<sup>nd</sup> charge applications are typically more complicated, labour intensive and admin heavy than 1<sup>st</sup> charge applications and can involve additional costs to us for items such as:</p> <ul style="list-style-type: none"> <li>• Land Registry Searches</li> <li>• Credit Searches</li> <li>• Consent from Existing Lender</li> <li>• Redemption Statement</li> <li>• Lender Questionnaire</li> <li>• Deed of Postponement</li> <li>• Maximum Lending Liability Statement</li> <li>• Automated Valuation</li> </ul>

	<p>However, if a 2<sup>nd</sup> charge does not require us to obtain items that present an additional cost, our charge may be discounted.</p> <p>These fees represent fair value for clients.</p>
<p>Customers With Characteristics of Vulnerability:</p>	<p>Our products are designed to include some customers with characteristics of vulnerability or who will experience vulnerability over the length of the product.</p> <p>All applications will be on an advised basis from a registered mortgage advisor. This provides a degree of assurance that the customer understands the product especially for those who have little financial services knowledge.</p> <p>We consider the needs, characteristics and objectives of the customer who may be vulnerable with understanding that any customer can become vulnerable at any point during the customer journey.</p> <p>We have a Vulnerable Customer Policy in place to ensure that where vulnerability is identified we can ensure appropriate steps are taken and customers are treated individually.</p>