



ALLTRUST[®]
A UAP Group Company

SOPHISTICATED INVESTOR SIPP

Key Features

November 2025

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Important Note

This document provides you with the key features of the Sophisticated Investor SIPP.

The Financial Conduct Authority ("FCA") is the financial services regulator and primary supervisory body for Alltrust Services Limited ("Alltrust") as a SIPP provider and operator.

It requires us to give you this important information to help you to decide whether an Sophisticated Investor 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.



Aims

The Sophisticated Investor SIPP aims to provide you with the following:

- A means to save for your retirement in a tax-efficient way, as growth in your fund is usually free from income tax and capital gains tax;
- Investment options, restricted only by legislation and good practice and for;
- A wide range of options at your retirement, including drawing income from your fund or purchasing an annuity;
- The provision of a product that is flexible in meeting your changing needs and personal circumstances both at and before retirement;
- To provide cash and/or pension benefits to your financial dependents in the event of your death; and
- The ability for you to make your own investment decisions or appoint a financial or investment adviser.

Commitments

At Alltrust we have experienced and dedicated staff who handle all the administrative requirements of your SIPP. We aim to create personal relationships with all of our members. Our primary focus is to ensure good outcomes for our customers.

Your commitment is to recognise the value of saving for your retirement and the benefits to achieving this using our products and services.

- There is no commitment on your part to make any contributions, or to continue making contributions once you start. Contributions can be started or stopped at any point.
- SIPPs are a long-term investment. Benefits can only be drawn from the SIPP in accordance with UK legislation that prevails at the time.
- Currently, benefits can generally only be drawn from age 55 (age 57 from April 2028), unless you retire due to ill-health, or have a protected early retirement age.
- Fees are chargeable in relation to the administration of the SIPPs and are in addition to those of any investment or financial adviser. These fees will be drawn from the fund unless you advise that you wish to pay these personally.
- When you take pension income from the SIPP any income that you take will be subject to tax by HM Revenue & Customs ("HMRC"). HMRC will notify us of your tax code at the time you take the pension benefits or we have to apply an emergency code.

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- To inform us of any changes in your residency or tax status immediately.
- To keep a minimum balance in the SIPP bank account available to pay fees and charges at all times (refer to page 8).

Risks

Depending on where you invest, the value of your SIPP may go up or down. The value of your SIPP at the time you take your benefits or transfer out will affect the level of pension benefit that you may take.

SIPPs are long term investments and are usually held for over 10 years.

Legislation, inflation and taxation changes, could affect the amount of pension benefit that you may take in the future or what you can contribute or invest in.

Some investments, such as property, held by the SIPP may be harder to value, or to sell, than other investments. This could affect the timing, and level, of your pension benefits.

High levels of income withdrawal may reduce the amount of fund you have left to purchase an annuity, or to provide for dependents' benefits. Before withdrawing any benefits we would recommend you speak to a financial adviser or seek guidance through the Government's impartial guidance service called Pension Wise (www.pensionwise.gov.uk).

Investment decisions for the SIPP will be yours to make with the guidance of your adviser or fund/investment manager.

If you transfer your benefits from an employer's occupational scheme, you may be giving up other rights and benefits. Please consult a financial adviser before proceeding.

Charges may increase throughout the lifetime of the SIPP. Where these apply to Alltrust, we will communicate this to you in advance of any increase.

We will reclaim basic tax rate on the net contribution you pay, provided you are a UK resident, but this can take up to eleven weeks to be received and may hold up investments or payment of benefits.

Breaches of legislation may result in tax changes and penalties being imposed by HMRC, which will reduce the value of your pension.

Questions and Answers

What is the Sophisticated Investor SIPP?

The Sophisticated Investor SIPP is a Self Invested Personal Pension established under a Master Trust. Alltrust acts as Provider and Scheme Administrator, and Alltrust SIPP Limited (a sister company of Alltrust) as the Trustee.

The Sophisticated Investor SIPP is a type of personal pension that gives you control of your pension fund, allowing you to make decisions on how your funds are invested within a range of investment opportunities.

Alltrust is responsible to HMRC for the operation of the Scheme in accordance with the Scheme Rules. It is also responsible for the reclamation of tax in respect of personal contributions and (in the case of accessing pension savings) deduction of tax on income payments.

The assets of the scheme are held by the SIPP Trustee for the benefit of the member. Investment decisions are normally made by the member, their adviser or an investment manager depending on what instructions you give us.

The SIPP should be recommended by a regulated financial adviser. We will only accept Direct (non-advised) business where the member has met and evidenced our 'Knowledgeable Investor' requirements. These requirements will depend on the investment, regulations, location of the investment and investor and FCA rules and guidance at the time of the check.

If you need more information on any of the terms used in this paragraph, please contact your financial adviser, or Alltrust.

What is a Syndicate?

A Syndicate is a means to allow multiple Sophisticated Investor SIPPs to purchase an interest in a shared asset, usually commercial property. Each member of the syndicate has full control over their individual SIPP account, which is separate to the syndicate. The syndicate is not a legal entity in the same way that the underlying SIPP is, and the syndicate agreement is written under separate rules from the standard Sophisticated Investor SIPP.

How much can I contribute?

The Sophisticated Investor SIPP has an initial investment minimum of £100,000: this amount must either be transferred in or contributed to set up a Sophisticated Investor SIPP.

The calculation of allowable contributions can be very complex, as it includes all forms of income, and advice should be sought from an accountant, tax adviser or financial adviser to ensure any contribution is within HMRC limits.

The Annual Allowance is the maximum level of gross contribution that can be made in any year. In March 2023 this was set at £40,000 and this has not changed. This reduces to £10,000 if you have taken any benefits or lump sum from a money purchase pension scheme (SIPP, personal pension, Defined Contribution employer scheme, stakeholder scheme etc).

It may also be possible to 'Carry Forward' unused Annual Allowance for the three years prior to the tax year in which you make the contribution.

The Annual Allowance for each of these previous tax years is £40,000 and you must deduct from this any gross contributions already made in that tax year. You must also have been a member of a registered pension scheme for the tax year to which the Carry Forward applies. There is a strict method as to how the contributions are allocated. You must first use up the Annual Allowance in the current tax year, and then allocate any additional amounts to the earliest tax year of the three previous tax years.

An employer can make a contribution up to this level on behalf of an individual, although they must take regard of the fact that any contribution for an individual should be appropriate to their position within the company. Employer contributions are paid gross to the fund.

Can I transfer other pensions in?

It is possible to transfer benefits from other registered pension schemes into your Sophisticated Investor SIPP. Normally, these benefits will be transferred as cash into the bank account held as part of the Sophisticated Investor SIPP. It is also possible to transfer existing assets from other registered pension schemes. This involves re-registering the ownership of the asset. Sometimes this process can be complex and time-consuming, and some assets may not be transferable. It is often worth obtaining confirmation from the current provider that they will allow the in-specie transfer.

Our SIPP does accept transfer of pension benefit from overseas in certain circumstances and at the discretion of the Trustees. For further information please contact us.

We recommend financial advice be sought before transferring any benefits to the Sophisticated Investor SIPP.

Kindly note that if the scheme you are transferring from is a Defined Benefit arrangement, then we will require confirmation that appropriate financial advice has been sought and that the transfer has been recommended (evidenced by providing us with a certificate).

Can I transfer my pension out?

If you wish, you can transfer all of your accumulated funds from your SIPP to another registered pension scheme or use the funds to secure benefits in the form of an annuity. This may involve either the encashment of assets and the transfer of monies, or the re-registering the ownership of the asset so that it becomes an asset of the other registered pension scheme. Again it is often worth obtaining confirmation from the current and future providers that they will allow such a transfer.

We always recommend financial advice be sought before transferring or securing any benefits. Please note that if you have taken advice to transfer we will need to see a copy of the suitability report (advice report) showing a positive recommendation to transfer along with the reason why. If you have not taken advice we will require either a completed knowledgeable investor form and that the knowledgeable test is passed or a MoneyHelper interview.

In some circumstances, after the transfer or securing of benefits has been paid an additional sum of money may arise that was not included when benefits were originally calculated. This is commonly from a deferred dividend payment arising out of equities that the SIPP had held prior to transfer. In most cases these monies will be passed on to the receiving provider. If they cannot be accepted, however, and there remains no other avenue by which the funds can be used for transfer or retirement, then such payments may be paid to charities nominated by Alltrust from time to time.

What investments are allowed?

The Sophisticated Investor SIPP allows a broad range of investments to be held.

Please note we have a preferred list of DFMs as follows:

- Platform One (Alltrust Platform);
- 7IM;
- A J Bell Investcentre;
- Brooks Macdonald;
- Canaccord;
- Hubwise;
- KleinwortHambros;
- LGT Vestra;
- Quilter Cheviot;
- Rathbones;
- RBC Brewin Dolphin;
- Scottish Widows Platform (Embark);

- Stocktrade (Embark);
- Telford Mann; and
- Transact

If you are already in an Sophisticated Investor SIPP and use a different DFM you may continue with that provider but if you want to change who your DFM is then the approved list will apply or alternatively we can investigate whether another DFM is acceptable

If you wish to use another DFM we will need to approve it and this will take time, and may result in us not accepting that DFM.

Any investment in the Permitted List can be used and if categorised as a Knowledgeable Investor those in the Knowledgeable Investor List are also allowed. Members can invest in any of the listed assets to form a suitably diversified portfolio. Certain asset categories may have a maximum percentage allocation, for more information please contact us.

All investments must go through our internal due diligence process and as such some may be refused. This process in no way is an approved investment list or a preferred provider list and is for internal use only.

Permitted List

- Deposit accounts with any UK or EEA authorised financial institution. The cash must be able to be withdrawn in less than 30 days and to be held by Trustees (not in the members name);
- Stocks and shares listed or dealt with on any HMRC recognised stock exchange including:
 - Equities;
 - Fixed interest securities issued by government or other entities (subject to a minimum credit rating of BBB – Standards & Poor or equivalent);
 - Debenture stock and other loan stock;
 - Permanent interest-bearing shares (PIBs); and
 - Convertible securities.
- Closed ended investment companies;
- Alternate Investment Market (AIM) securities;
- Investment grade Gold bullion (100% is allowable in portfolio);
- National Savings & Investments (NS&I) Income Bonds and Guaranteed Growth Bonds (investments that allow Trustees to hold it);
- Trustee Investment Plans (TIPs);
- Depository interests (including CREST depository interests);
- Authorised unit trusts;
- Authorised Open-Ended Investment Companies (OEICs);

- Shares in Investment Trusts;
- Insurance company managed funds and unit linked funds;
- Direct purchase of Commercial Property in the UK (subject to specific consideration and approval by Alltrust as outlined in our Commercial Property Guide);
- Exchange Traded Funds (ETFs);
- Offshore funds recognised by the FCA;
- Real Estate Investment Trusts (REITs);
- Pooled investment vehicles and syndicates where the member cannot influence or control the investment (known as Genuinely Diverse Commercial Vehicles (GDCV));
- Exempt Property Unit Trusts (EPUTs); and
- Secured loans to unconnected third parties.

Knowledgeable Investor List

- Deposit accounts which are unbreakable;
- Hedge Funds;
- Foreign Exchange (FX) Accounts (subject to specific considerations and approval by Alltrust);
- Contracts for Difference (CID) on recognised exchanges and subject to specific consideration and approval by Alltrust;
- Traded futures and options (relating to stocks & shares on a recognised futures exchange);
- Second hand / traded Endowment policies (subject to specific considerations and approval by Alltrust);
- Qualified Investor Schemes; and
- UK structured products.

The following investments may be allowed for knowledgeable investors if accepted by Alltrust after specific consideration and approval:

- Property syndicates;
- Unquoted UK equities;
- Commercial loans to unquoted UK limited company with no connection to the member;
- Unregulated Collective Investment Schemes (UCIS);
- Any other investment not listed in either permitted, knowledgeable investor or non-permitted lists.

Non-Permitted Investments

HMRC will only allow certain investments within a pension scheme and if they deem any asset unauthorised that is in the pension this will trigger an HMRC unauthorised payment charge and potentially a scheme sanction charge (this could be up to 55% of the original purchase price of the asset with the potential for interest to be added).

- Overseas unquoted equities;
- Onshore and Offshore bonds;
- Unbreakable long-term deposits;
- Direct purchase of residential property;
- Direct purchase of tangible moveable property for example, art, antiques, machinery, solar panels;
- Commodities (other than investment grade gold bullion);
- Loans to individuals or connected parties;
- Wasting assets (life span of less than 50 years);
- Property limited liability partnerships;
- Residual ground rents;
- Indirect investment in residential property and tangible moveable property, for example, residential property used as security;
- US Mutual Funds;
- Direct purchase of overseas commercial property (including agricultural land, hotels, nursing homes, shops, offices and public houses/Rosts);
- National Savings & Investments (NS&I) Premium Bonds and Direct Saver Accounts;
- Off-plan hotel developments;
- Bed & Breakfast units;
- Carbon credits;
- Cryptocurrency;
- Cloud lending;
- Land banking;
- Storage pods and units;
- Individual hotel rooms;
- Litigation funding;
- Intellectual property (including brands and trademarks) which involve transfer pricing or have a potential for tax avoidance;
- Direct investment in Partnerships and Limited Liability Partnerships (LLPs);
- Goodwill;
- Peer to Peer (P2P) lending;



- Shares in a Special Purpose Vehicle as defined by the FCA;
- Shares quoted on the Over the Counter market;
- Unquoted corporate bonds in private limited companies;
- Unlisted warrants;
- Solar power; and
- Wind turbines.

Although you will be responsible for any investment decisions that are made, it is important that you consider whether to appoint a professional financial adviser to assist you in this process. They will be able to consider your personal circumstances, amongst many other things, when helping you to make investment choices.

Bank Account Arrangements

Banking facilities are provided by Allica Bank, Metro Bank and Barclays Bank and are free of charge to all SIPPs. There are two exceptions to this: CHAPS (same day) Sterling payments and payments to overseas bank accounts, where there is a fee charged by the Bank.

Interest rates for the Bank Account will vary in accordance with the practices of the Bank.

The terms of our agreement with our Banking partners involves Alltrust undertaking aspects of bank account management, for which we may receive a commission.

All SIPPs have a minimum balance requirement which must be maintained in your SIPP bank account to cover fees and charges. The balances are: without property - £2,000 and with property - £3,500.

Where global bank accounts exist for the management of collective monies (for example in making payments to, or from, HMRC in relation to PAYE or recoins of tax on contributions), interest may accrue from time to time on those accounts. Such interest will typically be of a nominal nature and will be paid to charities nominated by Alltrust, as the cost of calculation of appropriate distributions will typically exceed the monies available.

Alltrust will keep this policy under regular review and will revise this should it be deemed appropriate.

What options do I have at retirement?

Benefits from the Sophisticated Investor SIPP can be drawn from age 55 (age 57 from April 2028), but in some limited circumstances, such as ill-health, benefits can be drawn at an earlier age.

Benefits can be paid as either cash or a pension income.

Cash

Cash is paid in one of two ways:

1. UFPLS - You may elect to draw any amount up to the value of your fund, as a lump sum. As such, you will receive 25% of the payment tax free and the rest is taxed at your normal tax rate. This keeps any remaining monies as uncrystallised pension.
2. Pension Commencement Lump Sum ("PCLS") – you can take 25%* of the value of your fund tax free and either opt to take an income or preserve the rest of the pot for an income at a later date. This is crystallising your pension.

*some members may have a protected cash sum for a higher amount and that figure will be paid.

Income

Income is taken as Flexi-Access Drawdown if this is the first time you are taking an income. A certain amount of fund can be designated for drawdown, which means that it can then be drawn as income. There are no restrictions to the amount of the fund that can be taken as income. The income is processed through the PAYE system, and the net payment is made to you.

If you have already have funds in Capped Drawdown (income taken prior to 6 April 2015) you can move further funds into existing capped drawdown arrangements. The level of income will be capped at 150% of the rate set by the Government Actuary's Department and will usually be reviewed every 3 years. Alternatively, you can convert to a flexi-access drawdown.

You can also purchase a Life-time Annuity with all or part of the funds in your pension. An annuity is payable for life, and different options are available depending on your circumstances. Alltrust do not offer a Life-time Annuity and you will need to choose a provider.

Taking an UFPLS, PCLS or flexi-access drawdown you will trigger the MPAA which means you may be restricted on the contributions you can make into a pension. We recommend that you take suitable advice before asking for the cash and/or income to ensure you know the tax situation.

With capped drawdown if your income remains below the cap the amount of defined contributions on which you can get tax relief each year is the Annual Allowance, not the MPAA.

IMPORTANT NOTE: Drawing pension benefits from your SIPP is an important decision. It can also be a complicated issue and can have long term consequences. Payments will be subject to tax, and any funds drawn out can affect your level of income in future years.

We consider it vital that you seek financial and tax advice before proceeding, or that you refer to the free and impartial Pension Wise service from MoneyHelper (www.moneyhelper.org.uk/en/pensions-and-retirement/pension-wise). MoneyHelper is sponsored by the Department for Work and Pensions through the HM Government's arm's length body the Money and Pensions Service.

An indication of the amounts available will be provided at the time that you wish to draw benefits.

Are any benefits paid if I die?

The death benefits which can be paid when you die vary, depending on your age when you die. Death benefits will be paid to your nominated beneficiaries, who may be dependants, nominees or successors, at the discretion of the Operator, Alltrust Services Limited.

What happens if I die before age 75?

In the event of your death before age 75, before taking any benefit or whilst receiving income drawdown, your fund, up to the current lump sum and death benefit allowance, can be paid, tax free as a lump sum.

Alternatively, the whole of the fund, up to the lump sum and death benefit allowance, may be used to provide beneficiaries' pensions tax-free.

Pension benefits may be taken as follows:

- beneficiaries' flexi-access drawdown; or
- beneficiaries' lifetime annuity.

Who is a dependant?

A dependant is defined as one of the following at the death of the member:

- a spouse or civil partner;
- a child of the member who:
 - is under 23;
 - is over 23 and dependent on grounds of physical or mental impairment; or
 - is taking, or is to take, dependent's drawdown and who reached their 23rd birthday after 15 September 2016;
- a person who is not a spouse, civil partner or child of the member but;
 - is financially dependent on the member;
 - has a financial relationship with the member and a mutual dependency; or
 - is a person who is dependent on the member on the grounds of physical or mental impairment.

What happens if I die after I reach age 75?

If you die at, or after, age 75, before taking benefits or whilst receiving income drawdown, your fund can be paid to your beneficiaries as a lump sum taxed at the recipient's marginal rate of income tax. If the beneficiary is not an individual, for example a trust fund or a company, a 45% tax rate will apply.

Alternatively, your fund may be used to provide beneficiaries' pensions. Any beneficiaries' pensions will be taxed as earned income.

Pension benefits may be taken as follows:

- beneficiaries' flexi-access drawdown; or
- beneficiaries' lifetime annuity.

OR if there are no dependants, the death benefits can be given to a charity, tax-free.

What happens if my beneficiaries die whilst receiving a pension?

If an individual receiving beneficiaries' flexi-access drawdown income dies, the same death benefits will be available for their nominated beneficiaries, known as successors. Tax treatment of payment to successors will depend on whether the first beneficiary died before reaching age 75 or not; not the age of the original member at the time of their death. If the successor dies and funds still remain available, the same options are available to their successors and tax treatment is dependent on their age at death.

What are the fees I will be charged?

The fees that are associated with the Sophisticated Investor SIPP can be found in our separate Fee Schedule, which forms part of our application pack, along with the application form, Terms & Conditions and Permitted Investment List. Our fees will be directly deducted from your SIPP. You should ensure that there is sufficient cash available in your SIPP to pay fees when they are due.

As well as our fees you will need to pay any agreed fees with your Financial Adviser, which can be deducted from the monies available in your SIPP. For details of the fees please see the Adviser Charges document you have signed that your adviser should have provided you with a copy of. Please note these may be a one off payment or be continuing.

The assets you decide to invest in will also have fees deducted. For details of these fees please see the asset providers documentation. These fees will be deducted directly from the asset and will not be deducted by us. You may also have to pay fees to any wrapper product such as a Platform or Fund Manager that holds, buys or sells your assets. Details of these should be provided by them and they are deducted before we receive the monies so we will not be paying these fees.

Can I change my mind?

You will be provided with a right to cancel your application for 30 days from the day you receive your right to cancel documentation.

This can be waived at the establishment of the Sophisticated Investor SIPP, and if you do so, you will not be provided with this right.

You will also have the right to cancel any transfers in to the Sophisticated Investor SIPP that are received for a 30 day period from the date they are received into the SIPP, irrespective of whether you waive your right to cancellation of your application. On a transfer you can waive your cancellation rights after 14 days ie the remaining 16 days of the 30 days. If you elect to cancel any transfer, Alltrust will attempt to return the monies to the transferring scheme. If it is not possible for the monies to be returned to the transferring scheme, you must provide Alltrust with details of an alternative scheme to which the payments can be made.

You will risk losing any benefits that might have been available from the transferring scheme if you do elect to cancel a transfer that cannot be subsequently returned to the transferring scheme.

Finally you will have a right to cancel any option you make to take unsecured pension (this does not include a lump sum payment ie it only applies to the initial income taken) from your SIPP for a period of 30 days from the date any payment is made. If you elect to cancel this option, you must repay any and all amounts back to your SIPP.

Any cancellation notice can be given in an email, letter or in a telephone call.

Other Information

If something goes wrong, am I entitled to compensation?

The Financial Services Compensation Scheme ("FSCS") offers compensation when an authorised firm is unable, or likely to be unable, to pay the claims against it. Alltrust is covered by the FSCS. You may be entitled to compensation from the scheme if we cannot meet our obligations.

The FSCS also covers eligible investments within your SIPP. As Alltrust SIPP Limited is the legal owner of all investments, we are able to claim on your behalf if any authorised provider of the underlying assets within your SIPP fails.

Further information is available from the Financial Conduct Authority or the FSCS.

What if I have a complaint?

Alltrust has an established complaints procedure in accordance with the regulations and guidance set by the FCA. If you have a complaint please contact:

Customer Relations
Alltrust Services Limited
Suite 201 Warner House
Castle Street
Salisbury SP1 3TB
Tel No: 01722 770460
Email: customerrelations@alltrust.co.uk

If you are not satisfied with the outcome of our investigation, you may have the right to contact the Financial Ombudsman Service ("FOS") free of charge.

The FOS's website can be found at www.financial-ombudsman.org.uk and you can make your referral on it.

For a complaint that relates to our administration and service, you may have the right to refer your complaint to the Pensions Ombudsman free of charge.

Pensions Ombudsman
10 South Colonnade
Canary Wharf
London E14 4PU
Tel No: 0207 630 2200
Email: CentralSupportMailbox@pensions-ombudsman.org.uk
Website: www.pensions-ombudsman.org.uk

Terms and Conditions

The terms and conditions for the Sophisticated Investor SIPP are enclosed within the Scheme documentation. This comprises the SIPP Trust Deed and Rules and the Member's Application Form. Fees are chargeable in accordance with the Sophisticated Investor SIPP Fee Schedule.

Copies of these documents are available on request.

Alltrust and Alltrust SIPP Limited does not provide financial advice. We recommend that you seek professional financial advice. Details of any cost for financial advice will be provided by your financial adviser.

Applicable Law

The information contained in this document is based on our understanding of current pension and financial services regulations which can be subject to alteration as tax laws and legislation may change over time.

All communications relating to the Sophisticated Investor SIPP will be made in English. The laws of England and Wales will apply to the Sophisticated Investor SIPP, this is current as to our understanding of the laws and regulations.



Additional notes and important information

Alltrust requires members to obtain regulated financial advice for certain pension transactions, including but not limited to benefit crystallisation, the transfer of pensions into or out of your Alltrust pension, and the transfer or purchase of non-standard investments, unless the member has been formally assessed and accepted as a Knowledgeable Investor by Alltrust.

Where advice is required, it must be provided by a suitably qualified and regulated financial adviser. That adviser must have a signed agreement with us, except in the case of transfers out, where they must simply hold the appropriate regulatory permissions. This requirement is in place to ensure decisions are made in the best interests of our members and in line with regulatory expectations.

Alltrust reserves the right to decline any instruction that does not meet this requirement.

If you are unsure whether advice is required for your specific request, please contact us before proceeding.

Alltrust Current Terms of Business are available to view on our website.

Alltrust Services Limited

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