

# CONSUMER DUTY

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It is the responsibility of HUB Financial Solutions as a distributor to distribute only products that represent fair value and only to consumers in the target market of the product with needs that the product addresses.

We have reviewed the published fair value assessments of the manufactured products HUB Financial Solutions distribute, which include a clear statement of target market, product benefits and needs relevant to different consumer groups, to ensure HUB Financial Solutions distributes products to the intended target market(s) and customers with appropriate needs.

## SUMMARY OF THE DESTINATION RETIREMENT SERVICE

Destination Retirement (DR) is a digitally led, hybrid financial (restricted) advice service, for customers who wish to access their savings to generate an income, typically as they move into retirement. It is designed to provide ongoing advice on how best, from a tax efficiency perspective, to utilise and draw down customer's assets to meet their needs for income throughout retirement. It is targeted at the mass market, typically individuals with investable wealth of less than £250,000 and with limited to low financial sophistication although the pricing and benefits of the service may also appeal to customers with higher levels of wealth. Customers with funds in excess of £750,000 are referred to our separate HUB Financial Planning service, which is considered more appropriate for higher wealth individuals with more complex needs.

DR provides Regulated Advice on the optimal blending and best usage of Pension, Individual Savings Account (ISA) and General Investment Account (GIA) assets to make income tax efficiencies for customers wishing to access their retirement savings. A lifetime annuity may also be recommended as part of this blend.

The Regulated Advice provided is Restricted in that it is limited by product, product provider and investment funds. DR is a service provided by the legal entity HUB Financial Solutions who are the regulated entity responsible for the advice delivered. DR operates on core principles of affordability for the customer and resilience of core income needs in the face of future uncertainties. The principles are embedded in the process from outset, so the customer understands and accepts them before proceeding.

DR is designed to be an ongoing advice and service relationship with the customer, it is not designed or appropriate for a customer wanting 'one-off' transactional advice. Our service proposition is designed to provide a high level of service and positive customer outcomes. Communications, including annual statements, and customer documentation are regularly reviewed, tone of voice is in line with our brand and in plain English and has undergone internal assessment. As part of ongoing work, we include consumer testing on core documents.

## TARGET MARKET

**We have a clear set of benefits aimed at a clear target market.** We include customer research, both direct and desktop based, in our proposition design procedure to ensure we are developing services to meet demonstrated customer needs.

The service is designed and suitable for clients who:

- are aged 55-73
- looking to retire or access their retirement savings in the next 6 months
- having more than £10,000 but no more than £750,000 in retirement savings (excluding property)
- UK resident.

This service is unlikely to be suitable for clients who:

- are below 55
- looking to invest in advance of accessing their savings
- want to continue working and/or continue to contribute into their pension
- are looking for an execution only service
- complex debt or divorce cases
- customers with terminal illness or significantly impaired life expectancy
- customers wishing to continue to contribute to their DC pension
- customers wanting inheritance tax advice
- customers with low digital capability
- customers who receive any means tested state benefits.

Users aged 40 can still generate a free personalised retirement plan. They tell us how they want to spend their money and we'll show them how to maximise their income by minimising the tax they have to pay. Although we complete lots of calculations to create this plan it is not financial advice nor confirming a course of action. Only when a user becomes 55 and meets all the other criteria can they invest and become a customer of the Destination Retirement Service.

We do not believe any consumer groups within the target market are inappropriately excluded by the limitations of the product. Our staff are trained in recognising the types of customer vulnerability that may exist in our target market and ensuring that limitations of the product as they relate to individual customers (vulnerable or otherwise) are understood and that these consumer groups have access to the full value offering.

## DISTRIBUTION STRATEGY

Destination Retirement is distributed both Direct to Customer and through partners who have access to customers within the target market and with appropriate needs.

The service is provided through a hybrid of automated advice with professional adviser support. The DR online journey gathers personal, financial needs, objectives, medical information, and attitude to risk of the customer to provide a personalised recommendation, based on the DR system advice logic. This is checked by a qualified adviser and further information may be requested from customers depending on the personalised advice and recommendation we issue.

DR checks are through qualified financial advisers providing a personal recommendation on an advised basis. The lead adviser for the service has the following:

- Level 6 Diploma in Financial Advice (Adv DipFA)
- Pension Transfer Qualification (AF3).

**The HUB Financial Solutions distribution strategy combined with the service eligibility criteria provides assurance that only customers within our target markets will receive advice and only customers who will benefit from the product and receive appropriate value will receive a product recommendation.**

## FAIR VALUE

HUB Financial Solutions have completed a thorough price, value, and profitability review, concluding that the HUB Financial Solutions Destination Retirement our target markets fair value.

We believe our service provides fair value to all groups of customers relative to the profits made by HUB Financial Solutions from these services.

We'll monitor Fair Value as part of our proposition lifecycle management processes. Fair value assessments are undertaken at least annually to ensure that the services HUB Financial Solutions offer perform as expected and remain fair value.