

INVESTMENT POLICY

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Simpson Financial Services Ltd. is authorised and
regulated by the Financial Conduct Authority.
Registered in England & Wales number 4830621.

Investment Policy

Unless we notify you in writing to the contrary, we will be treating you as a “retail client”. This means that you are afforded the highest level of protection under the regulatory system and should have the right to take any complaint to the Financial Ombudsman Service.

Simpson Financial Services Limited offer Independent Financial Advice and we are Authorised and Regulated by the Financial Services Authority.

As an Independent Advisory firm we are duty bound to consider all products that fall under the definition of a Retail Investment Products. Full details of these products are available on request.

Know Your Client Information

Before any recommendations can be made, we are required to gather information about your personal and financial circumstances. The gathering of this information enables us to create a profile of your current needs and is imperative in ensuring that the advice we provide is suitable for your needs.

As part of this process we will ask you certain questions aimed at determining the types of Retail Investment products you are willing to invest in. By the same token this will also allow us to exclude from our recommendations any products that you do not feel comfortable investing in.

Any advice or recommendation that we offer to you, will be based on your stated objectives, circumstances and take into account any restrictions that you wish to place on the type of products you would be willing to consider.

Assessment of Risk

In order to ensure that all our clients receive the most effective advice possible we need to have in place a defined methodology for identifying :-

- [A client's tolerance to risk
- [What our clients goals and requirements are both now and in the future
- [What our clients Capacity for Loss is especially bearing in mind the obvious volatility investing brings

We have also looked at introducing a system whereby we can analyze a client's total assets and provide an analysis of how they fit with the outcome that our analysis produces.

Over and above these 4 basic requirements we have also established a process which is robust enough to provide the same standard of service to all our clients whatever their circumstances.

As I am sure you can appreciate in order to undertake such analysis we need to adopt a system that can support and deliver what we need;

After quite extensive research we have chosen a system called Dynamic Planner by Distribution Technology.

Distribution Technology is the UK's leading provider of financial planning and sales technology and has an excellent reputation for market-leading advice technology. Distribution Technology has recently appeared in the annual Tech Track Top 100 ratings in September 2009. Their tool allows us to analyse our clients' attitude to risk using a range of psychometric questionnaires, and providing clients with a view of the consequences of their decision through the production of expected gains and losses based upon clients' risk choices.

Once we have firmly established where your tolerance to risk lies then it is at this point that we will recommend a solution which best suits your needs.

Investment Committee

It is imperative that in what is a constantly changing marketplace that we keep up to date with any developments that affect our delivery to our customers. In order that we keep up to date we have created an internal Investment Committee to oversee our whole proposition for delivering the right investment solutions for our customers.

While the exact role of the investment committee may vary from time to time there are some clear objectives that it must follow;

- [The committee must have a clear understanding of their responsibility to manage the investment process rather than manage the portfolio itself.
- [The committee must ensure that when setting investment solutions it does so having taken account of the entire market place of Retail Investment products.
- [The committee should be responsible for setting policies and evaluating any model portfolios being recommended.
- [The committee should oversee the provision of sufficient internal and external resources. This should be done to support the investment process, as well as to ensure that the committee is receiving adequate, timely and accurate management information on portfolio risk and return.
- [The committee should also make sure that a proper record of its deliberations is maintained.

Model Portfolios

As part of our investment solution we may recommend that your money is invested in one of a range of Model Portfolios that we have selected.

Model Portfolios comprise of a bespoke mix of investments and can be established for any number of risk profiles as well product/tax wrappers.

Our Model Portfolios are investment risk rated and are numbered 1-10, where 1 is minimal risk and 10 is very high risk.

Please note that our Model Portfolios will only be used if considered to be fully suitable for your needs and are not be used as a default solution for all clients.

Investment WRAP/Platform

At Simpson Financial Services Limited we may arrange your investment portfolio via Transact. The key advantage of this is that you will have access to over 1,000 investment funds within one administrative platform, with online valuations and free switching facilities.

Before you can invest via the Transact platform we will need to open an account on your behalf.

Please note that we do not recommend Transact as appropriate for all investors in all circumstances and we can only make a specific recommendation of this platform following a review of your current financial position and objectives.

Conflicts of Interest

We offer independent advice but occasions can arise where we, or one of our clients, will have some form of interest in business that we are transacting for you. If this happens, or we become aware that our interests or those of one of our other clients conflict with your interests, we will inform you in writing and obtain your consent before we carry out your instructions.

Our review policy is determined by the category of service you have chosen. Details regarding our services are available upon request. Unless you have chosen to be a Discretionary or Advisory Service Client we will not review your financial arrangements and policies and therefore you will not be provided with any financial advice.

We require our clients to give us instructions in writing, to avoid possible disputes. We will however, accept oral instructions provided they are subsequently confirmed in writing.

We assume that you would not place any restrictions on the type of designated investment we may recommend or the market on which the transaction is to be executed. Where this is not the case, you will be required to issue us with written instructions, which clearly detail the restrictions on the type and market of designated investments.

Remuneration

Full details of our charges for this service can be found in our Client Agreement. Payment can either be taken from your investment upon receipt by the policy provider or paid directly by you.

Regular reviews

We believe passionately in the importance of proactive and innovative financial planning. Our world, and yours, is constantly changing and we aim to help you stay one step ahead and in control of your own destiny.

Your financial objectives may change over time due to changes in your life style or circumstances. We believe it is essential to ensure that your financial planning continues to meet your life style and investment objectives and would strongly recommend our ongoing review service if appropriate.

Please refer to our terms of engagement document which confirms more comprehensive details of what our ongoing review service means to you.