



Key Features of the Willis Owen Self Invested Personal Pension

CONTENTS

Its aims

Your commitment

Risks

Questions and answers

Cancellation

Other information

How to contact us

The Willis Own Self Invested Personal Pension (the Account) is provided by Embark Investment Services Limited (EISL) registered number 09955930 which is authorised and regulated by the Financial Conduct Authority (FCA). We are required to give you this important information to help you to decide whether this Account 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.

Where this document uses “we” or “our” this means Willis Owen.

The Account provides access to a wide range of investments that help to build your retirement savings. You can then take these savings how and when suits you (subject to Government rules and regulations).

You should decide if this product is right for you.

Its aims

What does it do for you?

Builds up a sum of money, in a tax-efficient way, to help you meet your future retirement needs.

A SIPP gives you access to a wide range of investment options, such as Mutual Funds, and Exchange-Traded Investments.

You can choose which investments are right for your money based on your retirement needs and your attitude to risk.

Finally, when you decide the time is right (and Government regulations allow) you can access your savings in a number of different ways to suit your income needs. Unless special circumstances arise, you will be eligible to access your pension from the age of 55.

Your commitment

What we need you to do

Take time to read the information in this document about the Account, including its features and risks, and any other documentation we provide to you.

Regularly review the contributions you make, your investment approach, and any income you are taking, to make sure your Account meets your future income needs.

Make sure we always have up-to-date information about you. You should tell Willis Owen when your circumstances change, for example, if you move house or you change your bank account or your country of tax residence.

Where applicable, view investments as being for the long term and remember that you won't ordinarily be able to take money out of your SIPP until you are at least 55.

Withdraw money from your Account only in ways that are allowed under the pension and tax rules that apply at that time.

Provide an email address that you regularly access. Willis Owen will use this address to contact you about documentation that is available to view in 'my documents' (see the Managing Your Account section for more information).

Risks

The things that could go wrong

The value of your Account depends on the performance of the investments you choose to invest in. The value of these investments, and therefore your Account, can go down as well as up and you may get back less than you put in. Your retirement benefits are not guaranteed.

The level of risk and potential investment performance depends on the investments you invest in. Past performance of these investments is not a guide or guarantee of how they will perform in the future.

Many of the investments available to you are intended as medium to long term commitments. If you take money out early, you may not get back the full amount you invested.

Investments in property funds can be difficult to sell. You might not be able to sell them when you want. The valuation of property is a matter of opinion rather than fact.

When you want to buy or sell shares there may not be a market for the shares you are interested in.

If you opt to cancel after making a contribution or transfer from another provider within the cancellation period, you could get back less than you invested. If you cancel a transfer from another provider to us, the other provider may refuse to accept the return of the transfer money. If this happens, you should discuss the options you have with Willis Owen.

Your retirement income could be less than you expect if investment growth over the lifetime of the Account, annuity rates at the time you take your benefits, or both, are lower than expected. The retirement income could also be less if you reduce or stop payments to your Account.

If you receive means tested benefits, taking an income from your Account might mean they are reduced or stopped.

Any charges we take from your plan will affect the value of your Account. These charges may vary from time to time. You can find more information about our charges and how we take them in our Charges Information Document. When a charge is taken from your Account you will receive confirmation details in the Charges Investment Document that we issue.

If we cannot pay any charges or other payments from your Account due to insufficient cash, we would need to sell other investments to meet these.

If you transfer money into your Account from another pension plan, the final pension benefits you receive could be less than if you stayed in your existing scheme. A Financial Adviser may be able to advise you whether a transfer is in your best interests and make clear any benefits you may be giving up such as 'enhanced protection' or 'fixed protection'. Please note we do not accept transfers from final salary schemes.

Over time, inflation will reduce the buying power of the money you have saved. For example, if inflation is 2% pa, then in 20 years' time, £10,000 will buy only the same as £6,676 buys today.

Whenever you start to take a Drawdown Pension you will trigger the Money Purchase Annual Allowance if it has not already been triggered. This will reduce the maximum contributions you can make into your SIPP. Please contact Willis Owen for further details.

If you take a higher than planned level of income (for example as drawdown pension) over a long period of time, it is likely that your Account value will not be enough to provide an income for as long as you may have originally wanted.

If you take a large proportion of income in a short period you may end up paying a higher rate of tax than usual.

To provide the same long-term income as buying an annuity, your Account will need to grow by more than the interest rate used to calculate the annuity. This higher growth rate is called the critical yield. Your illustration shows critical yields for different periods.

Questions and answers

Who can invest?

To open an Account you must:

- be aged 18 or over
- be resident in the UK for tax purposes.

Is this the right option for me?

The Account could be right if you:

- are willing to invest your capital over the medium to long term, understanding that you may not be able to take money out until you are at least 55
- want to benefit from tax relief on your contributions – subject to Government limits
- want access to a wide range of investments and understand and accept the associated risks
- want flexibility on how and when you take your retirement benefits
- want a way to consolidate your other pension savings and start taking retirement income.

How do I start saving in a SIPP?

You can start saving in a SIPP once you have decided it is the right product for your needs. You can open an Account online at willisowen.co.uk and start saving immediately using your debit card or by setting up a direct debit.

How much can I save in my SIPP?

A SIPP can be started with a minimum contribution of £25 paid either regularly or as a one-off. There is no maximum limit on how much you can put into your Account but there are limits on the amount of contributions that are eligible for tax relief. There is more information about this and the annual allowance limit in our What about tax? section below.

The following types of payments can be made into your personal pension:

- Regular contributions – monthly, quarterly, half-yearly and yearly
- One-off contributions
- A transfer of investments from an existing third party pension arrangement.

There is also a choice of ways to make these contributions:

- by Direct Debit
- electronically by debit card.

Once you have made payments into your Account, you will not be able to access them until you reach the age of 55.

Can I transfer in the value of other pensions?

If you instruct a transfer, we will normally receive the money from your registered pension scheme into your Account with us in one of two ways:

- as a cash transfer
- as a re-registration of investments.

A re-registration transfer can only happen if your SIPP offers the same type of investments that you have in the existing pension scheme. If your pension with another provider is being used to provide a

Capped Drawdown Pension then when you transfer your pension to us the pension will be converted to a Flexi-Access Drawdown Pension.

You can find out more information on both these types of transfers in our Client Terms and Conditions.

What are the charges?

The following shows the type of charges that could be applied to your Account depending on the services you choose to buy. Charges are deducted from the 'available cash' part of your Account. You can find a more detailed description of our charges in our Client Terms and Conditions. To find out the actual charges you should refer to the Charges Information Document and your Key Features Illustration.

Ongoing and ad hoc charges, may include:

- a service fee
- charges incurred from using our Stockbroker Partner
- a drawdown charge.

What might I get back?

At application stage, we will provide an illustration that shows what you might get back when you decide to take your benefits. These are based on assumptions that include:

- amount invested
- performance of your investments
- effect of charges
- amount of any cash lump sum you take
- amount of drawdown income you take
- annuity rate that applies at the time
- effect of tax
- your chosen retirement date.

It is important to remember that the material effect of these assumptions will only be known at the date you decide to take your benefits together with other factors such as inflation.

How will I know how my Account is doing?

There are several ways you can keep up to date with how your Account is doing:

- you can obtain an up-to-date valuation of investments at any time by signing in to your Account online
- we provide you with a regular statement every three months showing the value of your Account and what it is likely to be worth in the future. The first statement is provided three months after you open your Account and will be put into 'my documents'.

Your statement will also show any income you have taken (if you are receiving drawdown pension).

What about tax?

How are contributions affected by tax?

If you are under the age of 75 and eligible to receive tax relief, the Government will pay an amount equal to the basic rate of tax to each contribution you make. If you are or have been a Scottish resident, the tax relief you receive might be different.

If you are eligible to receive tax relief, we will automatically add an amount equivalent to the basic rate of tax to your Account when you make your contribution as long as you confirm you are eligible for tax relief at contribution. We will then claim the amount back from Her Majesty's Revenue and Customs (HMRC).

Any transfers will not receive tax relief.

If you are a higher rate or additional rate taxpayer, you can claim extra tax relief on your personal contributions directly from HMRC as part of your annual tax returns. This additional relief is not added to your Account by us.

There is a limit set by HMRC on the amount you can contribute to your Account that benefits from tax relief. It is called the annual allowance. Where total contributions to all your registered pension schemes (including basic rate tax relief) exceed your annual allowance in a tax year, you will have to pay an annual allowance charge on the excess. Your annual allowance is also likely to be reduced if you are a high earner. Please refer to the Willis Owen website for further information.

The rate of the annual allowance charge is set at your marginal tax rate.

How are investments affected by tax?

Growth in the value of your SIPP is free from capital gains tax. UK dividend distributions are paid net of a 10% non-reclaimable tax credit. There is no further tax to pay on these. Certain types of income distributions paid to the SIPP are free from income tax.

How are retirement benefits affected by tax?

Any benefits that you take from your SIPP will be subject to income tax. The level of tax you pay will depend on your circumstances. HMRC apply limits on the amount of benefits you will be able to take before tax penalties apply. The rules and limits that apply may be different when you come to take your benefits.

You may also be able to take some of your savings as a lump sum with usually up to 25% being tax-free. You can find out more in our Client Terms and Conditions.

The lifetime allowance is the limit set by the Government on the value of funds you can accrue in all registered pension schemes that you are a member of, before additional tax charges apply. When you take the benefits from your Account, the fund will be tested against the lifetime allowance, and, you may have to pay additional tax on the excess. This does not include any state retirement pension, state pension credit or dependant's pension you may be entitled to. This may not apply to you if you have previously taken 'enhanced protection'.

For more information on the lifetime and annual allowance limits, visit www.hmrc.gov.uk/tax-on-your-private-pension.

Managing your Account

Your Account is set up and managed online and you will complete all transactions. This will include:

- setting up a new contribution or transfer
- changing the investments you are investing in
- taking retirement benefits
- making any other changes.

You will also be able to see:

- which investments you are invested in
- the value of those investments and how they are performing
- any charges applied
- any Account literature that we need you to read (this will be placed in your 'my documents').

How do I know where to invest?

Whether a particular investment is suitable for you will depend on your circumstances, your investment goals and your attitude to risk. Help with investing can be found on our website. We are an execution only service and we will never advise or instruct you on investing your money.

The range of investments we make available includes:

- Mutual Funds
- Exchange-Traded Instruments (ETIs) including securities

You can find out more about these types of investments in our Client Terms and Conditions.

What are distribution, dividend and interest payments?

Depending on the type of investments that you invest in you may be eligible to receive a certain type of income payment from that investment. These payments are not guaranteed and can go down as well as up. The different types of payments are:

- distribution payments
- dividend payments
- interest payments.

You can find out more information on these payments in our Client Terms and Conditions.

How is investment income paid?

All distribution, dividend or interest payments from your investments will be added to your Account as 'available cash'. The money can then be used to pay charges on the Account. It can also be reinvested back into certain types of investments to help your fund continue to grow. You can find out which type of funds will accept income reinvestment in our Client Terms and Conditions.

What about cash?

Within each Account we offer a cash facility. We do this by providing access to a bank account operated by our banking partner. This bank account is not unique to you but holds amounts of money for all Embark investors centrally.

What is a disinvestment strategy?

If we are due to take money from your Account to pay for any ongoing charges and you do not have enough available cash in the Account to cover any of these charges, we may automatically disinvest money from investments into available cash and apply the charges. You can find out more about disinvestment strategies in our Client Terms and Conditions.

Can I change my investments?

Yes, you can make changes to investments in the following ways:

- buy, sell and switch between investments
- redirect regular contributions to different investments.

In some instances, there may be restrictions on the sale of investments, for example, if an investment is suspended from trading, or where there are restrictions on when an investment can be sold.

What if I move abroad?

It is important that you inform us immediately if it is your intention to move abroad as you may no longer be eligible to contribute into your SIPP.

Taking your benefits

When can I take my benefits?

You can start taking your retirement benefits at any time from the age of 55 – even if you are still working. If you are in serious ill-health, you may be able to take your benefits earlier than this.

Any benefits you take from your Account will be paid in UK sterling into a UK registered bank or building society account.

What choices do I have to take my benefits?

When you approach your selected retirement age, we will let you know what your options are at that time. There is a free government service, Pension Wise, which can give you impartial information around the choices you have.

Currently the options include:

- converting your investments into retirement income by buying an annuity from an annuity provider
- drawing an income directly from investments in your Account, this is known as drawdown pension
- taking a tax-free pension commencement lump sum and using the remainder of your Account to either buy an annuity or take drawdown pension
- taking the whole value of your investments as a cash lump sum.

What happens if I die?

In the event of your death, any regular contributions being collected or withdrawals being made will stop.

The investments will remain unchanged and therefore subject to market movement until we receive any required documentation from your Personal Representatives that allows us to distribute any proceeds.

We will take into account any beneficiaries you nominate (you can do this on our Expression of Wish form) when we decide who to pay the benefits to and how much each person will receive.

Your beneficiaries can choose to receive the benefits as one of the following options:

- as a cash lump sum
- they can receive a guaranteed yearly income by transferring the benefits to buy an annuity from an annuity provider
- they can receive a flexible income that they can increase or decrease by taking the benefits as a drawdown pension.

We will write to your beneficiaries setting out the options available to them. These benefits may be taxed but this will depend on your circumstances at the time of your death. If you die before age 75, death benefits will normally be paid free of tax. However, if you die on or after your 75th birthday benefits will be subject to tax.

In some circumstances there may be a delay in passing the benefits on to your beneficiaries due to the type of investment that you are invested in, for example, an investment may be suspended from trading.

Cancellation

[Can I change my mind?](#)

Yes you can. We will send you a Confirmation Schedule document which will include details of your right to cancel. You will have 30 days from when we issue your Confirmation Schedule to cancel. We will tell you if a different cancellation period applies to you.

If you start to take retirement income (also known as drawdown pension) from your SIPP, you will also have 30 days to change your mind. Cancellation rights only apply to the first time you utilise drawdown pension on your SIPP.

[What will I receive back if I cancel?](#)

The amount we pay back will depend on what action has been taken in respect of your Account prior to the time you cancel. If you exercise your right to cancel within 30 days from when we issue your Confirmation Schedule we will refund any cash payment in full that we have already received as part of regular direct payments you have set up.

In all cancellation cases, any deductions we make when an Account is cancelled will be restricted to the following:

- our own charges
- charges incurred in relation to your investment choices
- charges incurred for any transactions you make.

The amount we pay back will also reflect any market movement in the investments between the date the money was first applied to your Account and the cancellation date. This may be less than your original investment.

If you start trading within the cancellation period you may be liable for any charges due to us and any charges levied by third parties such as investment managers or stockbrokers.

How do I cancel?

For all cancellations, we will require you to call Willis Owen on 0800 597 2525 to confirm your intention to cancel. On the call Willis Owen will verify your identity and then issue you with a cancellation notice to sign and return.

Other information

How to complain

If you are unhappy with the way you have been treated by us, you always have the right to complain. You can write to or telephone Willis Owen at the number and address below.

Willis Owen Ltd
PO Box 766
Borehamwood
WD6 9JS

Phone: 0800 597 2525.

If you are not satisfied with our response, you can then raise the issue with the Financial Ombudsman, using any of the contact methods below:

Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Phone: 0800 023 4567

Email: complaint.info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk/

Referring the matter to the Ombudsman will not affect your right to take legal action later on.

If your complaint relates to the processing by us of your pension you could raise the issue with the Pensions Regulator, using any of the contact methods below:

Head of Complaints at the Pensions Regulator
Napier House
Trafalgar Place
Brighton
BN1 4DW

Email: complaints@thepensionsregulator.gov.uk

Website: www.thepensionsregulator.gov.uk/

Terms and conditions

This document gives you the key features of the SIPP. It does not include all the definitions, exclusions and Terms and Conditions. You can find full details in our Client Terms and Conditions document. We will also provide you with an electronic copy in your Document Area if you decide to buy a SIPP.

We have the right to make changes to the Client Terms and Conditions. If this happens, we will let you know and explain the changes. Any changes will be added to your Document Area.

In the event of a conflict between the Client Terms and Conditions and this Key Features Document, the Client Terms and Conditions prevail.

Client categorisation

We categorise all of our clients as Retail clients under the FCA rules for all services and transactions. This helps us to make sure that you receive appropriate disclosure documents from us and that you are told everything you need to know in a timely fashion.

Communication

Our contract with you is in English and all future communication about it will be in English.

Financial Services Compensation Scheme (FSCS)

Embark Investment Services Limited is authorised by the FCA so you will have access to the FSCS. In the event you suffer financial loss because of our failure or an investment failure, the actual level of compensation you receive will depend on the basis of your claim and where the money you have with us is invested. The FSCS only pays compensation for financial loss. Compensation limits are per person per firm, and per claim category.

The FSCS may be able to pay you compensation if we or any banks with whom we place your money are no longer able to meet our or their financial obligations. If certain investments fail, you may also be eligible for compensation. In the unlikely event we fail, you may be eligible for compensation up to £50,000. For cash held on deposit you may be eligible for compensation up to £85,000. If your investment fails, you may be eligible for compensation of up to £50,000 per investment.

You can find out more details on the FSCS and how it covers your savings in our Client Terms and Conditions.

Law

You must be resident in the UK to open a new Willis Owen SIPP. The Willis Owen SIPP will be set up and governed by the law of England and Wales.

How to contact us

If you have any questions about your SIPP you should contact Willis Owen at the address and telephone number below.

Willis Owen Ltd
PO Box 766
Borehamwood
WD6 9JS

Phone: 0800 597 2525.

Available Monday – Friday 9am to 5pm

Calls may be recorded for training purposes.