

# M&G Wealth Platform

What you need to know about our investment platform and how it can support your business and your clients

May 2023



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# Introduction: Our platform, your way

M&G Wealth Platform is the chosen platform of more than 1,800 adviser firms across the UK, from small boutiques to major wealth management firms. We provide the flexibility to support individual client suitability requirements and a full range of adviser propositions, helping your business to grow and evolve as you want it to.

Today, we know you have a wide array of platforms to choose from. But we think there are many good reasons to partner with M&G Wealth Platform. From extensive functionality and investment options, integration with best-of-breed specialist partners and genuinely collaborative service and support, to transparent competitive charging. We'll detail these in full on the following pages.

### Supporting suitability

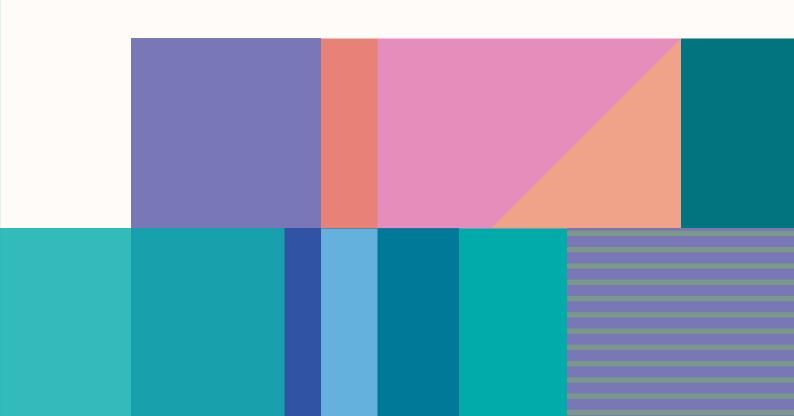
Under the FCA's product governance rules known as PROD, advisers must demonstrate their platform selection process and how a particular platform has been deemed suitable to help achieve the best outcomes for clients, something that is only becoming more important with the introduction of the Consumer Duty. We've created this guide to make it as straightforward as possible to compare what our platform offers against your own due diligence requirements.

This guide is intended to be comprehensive. But we know there are some things that are best discussed one-to-one. If you have any questions or just want to explore the platform further, speak to your M&G Wealth Platform contact if you already have one. Alternatively, email us at platformadoption@mandg.com.

We look forward to showing how M&G Wealth Platform is a reliable partner to help deliver your advice proposition and give every client the investment-planning experience they deserve.

R G Danney

Richard Denning CEO, M&G Wealth Platform





# Key benefits at a glance

Part of M	Part of M&G plc, a FTSE 100 company									
Transpare	ent all-ir	pricing	, plus ur	nlimited f	ree tradi	ng acce	SS			
Over 3,80	00 funds	s, plus lis	ted sec	urities ar	nd in-hou	ise and	third-pai	ty tax w	rappers	
Total flexi	bility to	build ov	vn mode	el portfol	ios or ou	tsource	to over 1	00 DFM	1s	
Full funct	ionality	for pre-	and pos	st- retirer	ment pro	position	S			
Member (	of the Lo	ondon S	tock Exc	change a	nd offer	intra-da	y dealing	at no c	ost	
Extensive	range o	of third-p	party too	ols						
Extensive	respon	sible inv	esting c	ptions ir	ncluding	specialis	st funds	and DFN	Лs	
Own-brai	Own-branding and white-labelling options									
Responsive, dedicated teams to support your business										
5-star Defaqto rating										
5 stars – Financial Adviser Service Awards 2022										

#### Suitability

# 1. Why choose M&G Wealth Platform

M&G Wealth Platform is not your ordinary platform. We offer some genuinely differentiating features that can add measurable value to adviser businesses. Whether you're happy with your firm's size and proposition or you are looking to evolve and grow, M&G Wealth Platform is ready to support your journey.

£15.5bn in assets under administration	1,800 adviser firms supported, representing 100,000 private investors	<b>5-star</b> Defaqto rating for platform features	<b>B+</b> AKG rating for financial strength	<b>5 stars</b> Financial Adviser Service Awards 2022
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As at end November 2022

Here for the long term – Nobody knows what the future holds. But as part of M&G plc, we provide the reassurance of being part of one of the world's strongest savings and investment businesses. And having completed a full technology upgrade in 2018-2019, we give you stability and certainty too. See Section 2. Our relationship with M&G.

Your proposition, your way – M&G Wealth Platform is built to support your whole client proposition – pre- and post-retirement with an intergenerational wealth solution in our family linking service. Plus our branding service allows you to customise the platform as your own. See Section 4. Here to support your client proposition.

**Platform expertise** – We've combined our own core platform expertise with integration with specialist partners. So we can help keep your business efficient and connected while delivering tools and functionality to give clients a great investment planning experience. **See** <u>Section 5. Features and tools on the platform.</u>

**Delivering your investment strategy** – Whether you want to create your own portfolios and select your own funds, use multi-asset solutions or outsource to any of over 100 discretionary fund managers (DFMs), M&G Wealth Platform has the flexibility and choice you need. **See** Section 6. Investment range, tax wrappers and outsourcing.

**All-in-one pricing** – Our transparent, truly 'all-in' pricing makes it easy for you and your clients to see the total cost of ownership (TCO) without worrying about additional costs. There are no extra fees for any of our services including unlimited free trading access through our award-winning stockbroking service. **See** Section 7. Simple, transparent charging.

Service built around you – From the Platform Adoption Team that gets you started to the Customer Service Team who support you day-to-day, we're committed to serving your business. Plus, we use your feedback to continually improve what we do – using online new business applications with real-time tracking, automated status updates and integrated digital signatures with DocuSign. See Section 8. Your M&G relationship, technology and training.

#### **Business structure**

### 2. Our relationship with M&G

We know that a strong and stable corporate structure is essential to assuring you of our ongoing commitment to the platform market. The ability to keep investing in our technology is also key to delivering the best possible service – today and in the future. That's why being part of M&G plc is so important.

M&G Wealth Platform is a wholly-owned subsidiary of M&G plc – the international savings and investment business. With a history stretching back more than 170 years, M&G plc has a long track record of innovating solutions to meet its customers' changing financial needs.

Today, M&G plc has two investment businesses that between them operate across 28 countries. M&G Investments offers global asset management, including platform and intermediary services through M&G Wealth. Prudential provides long-term savings, investments and retirement solutions. Together these businesses manage or administer £348.9bn in assets¹ on behalf of clients ranging from individual savers to major pension funds and insurance companies.

As at November 2022, M&G plc's financial strength is rated A by Standard & Poor's, A2 by Moody's and A+ by Fitch. Its Solvency II coverage ratio is 214%.

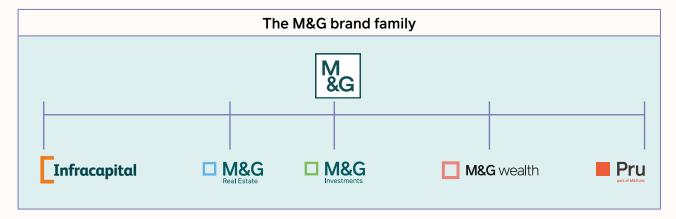
#### Open architecture independence

M&G Wealth Platform is able to draw on the full resources and experience of M&G plc to inform our investment planning solutions and operational development. M&G plc is continuing to invest in the platform, as well as leveraging its own market presence and distribution to grow the platform.

At the same time, M&G Wealth Platform remains fully open architecture, providing unbiased and adviser-driven access to a full market range of investment funds, tax wrappers and third-party DFMs.

	I	M&G plc in numbers	S	
FTSE 100 company	£348.9bn in assets under administration	28 countries where we serve clients	<b>214%</b> Solvency II coverage ratio	5m+ retail customers and 800+ institutional clients

As at end November 2022



### Sustainability

# 3. Your sustainable platform partner

M&G plc is incorporating socially and environmentally sustainable thinking throughout its business – from the way it invests to the way it operates its offices and interacts with customers.

- Sustainability reporting M&G has published a sustainability report. You can <u>read the full report</u> on the M&G website
- Sustainable investing The platform offers access to an extensive range of investments and DFM propositions. You can apply for additional investments to be added – subject to our onboarding criteria

### Your proposition

# 4. Here to support your client proposition

Whatever financial planning and advice services you want to offer – and whatever type of client you want to serve – M&G Wealth Platform can support your brand and proposition along with a range of services and features to provide a smooth, consistent and rewarding client experience.

#### Three adviser propositions

We offer three distinct propositions to support your brand. Once you've chosen one, we work with you to create a joint implementation and roll-out plan.

1. Standard M&G Wealth Platform	2. Branded option	3. Full white label
<ul> <li>Accessed from the platform log-in page on our website or as a link on your firm's website</li> <li>All platform pages branded with M&amp;G Wealth logo and corporate colours</li> <li>Output materials such as valuations, statements, contract notes and tax vouchers carry the M&amp;G Wealth brand</li> <li>Full M&amp;G Wealth Platform functionality, services, product partner and investment coverage and MI reporting suite</li> <li>No additional cost to standard M&amp;G Wealth Platform charging terms</li> </ul>	<ul> <li>Accessed from your firm's own website through a seamless link</li> <li>All platform pages branded with your firm's logo and corporate colours</li> <li>Output materials such as valuations, statements, contract notes and tax vouchers carry your firm's brand or are co-branded as required</li> <li>Full M&amp;G Wealth Platform functionality, services, product partner and investment coverage and MI reporting suite</li> <li>Developed at a one-off cost of up to £1,295 + VAT, depending on requirements</li> </ul>	<ul> <li>Accessed from your firm's own website through a seamless link</li> <li>Allows your firm to set up its own platform charging structure to create its own AUM, transactional and cash margin revenue lines</li> <li>Has separate commercial terms</li> <li>A separate business line leveraging the same platform and administration expertise</li> <li>Tailored firm functionality, services, choice of product partner and investment coverage, with bespoke MI reporting suite</li> <li>All platform pages branded with your firm's logo and corporate colours</li> <li>Output materials such as valuations, statements, contract notes and tax vouchers carry your own brand or are co-branded as required</li> <li>Branded stationery and collateral available</li> </ul>

Further information is available on request

#### **Delivering your proposition**

We offer a range of services to help you support clients at every stage of their investment journey.

#### Family linking

Can include spouses/civil partners, children, parents, grandparents and grandchildren:

- Client portfolio values are consolidated to calculate the group annual platform charge, with charges applied proportionately
- Self-serve valuation reports available to each family group
- Advisers can view a summary of all their family groups, including individual members

#### Retirement planning

Flexibility of choice on products, funds and portfolio construction:

- Pre- and post-retirement solutions
- Flexible withdrawal options including drip feed drawdown and sequencing risk management
- Create your own portfolios, use multi-asset or model portfolios or outsource to a DFM
- Leading insight on Centralised Retirement Propositions (CRPs)
- Flexible cash management options

#### Cash management

Manage cash in the way that works best for you and your clients, with the option to:

 Cover fees and charges by setting aside cash rather than including it in a model portfolio

- Allocate income payments and protect them from rebalances
- Or use a model portfolio to automatically top up a cash account

#### Maximising business efficiency

We are constantly looking for ways to improve our service so you can conduct business as easily and efficiently as possible.

Paperless processing – We've made great progress removing paper from our processes, introducing online new business application and integrated digital signatures with DocuSign so you and your clients can set up accounts and arrange products quickly and simply.

Bulk asset migration – When you're ready to bring your clients to the platform, we'll support you every step of the way. We'll work with you to create a bespoke plan tailored to you and your clients' needs, upload your clients' information and generate application packs. We'll keep you in the loop throughout the process and make sure things are simple and convenient.

**Faster processing –** with a seamless sell and withdraw process for ISAs and GIAs and automated transfers out, you save time and your clients get their money faster.

Business development support – However you want to use M&G Wealth Platform to support and advance your business, your assigned Business Development Manager (BDM) and our telephone-based Business Development Centre team are on hand to discuss your plans and how they can be implemented.

#### Research and insights

We work with leading external research agencies to investigate the market and specific adviser experiences. Our annual research on CRPs means we better understand what can help firms build and maintain repeatable approaches to some or all of their retirement planning while keeping client advice bespoke. We've learned how the Covid-19 pandemic has changed the way you need to work and how we can support you better.

These insights also help us to create 'How to' guides and share best practice experience to help you find the right solutions for your firm.

#### Features and tools

# 5. Features and tools on the platform

M&G Wealth Platform provides a comprehensive but easily navigable range of tools and features, including functionality from best-of-breed specialists. So, you can manage, monitor and report on client portfolios with complete control. Plus, you choose the level of platform access your clients can enjoy.

#### Client applications

DocuSign and track applications – Apart from in a few instances, our new business application is all done directly online so you have absolutely no paperwork. And with DocuSign, nor does your client. Straight through processing and integration with Salesforce means the application is quicker and you can track progress in real time, as well as receive automated status updates.

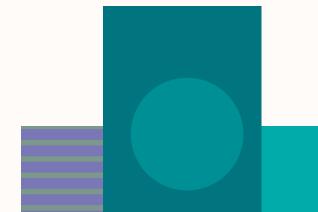
#### **Trading**

- Online trading All instructions to buy, sell or switch investments can be made online through M&G Wealth Platform in accordance with our execution policy. This can be viewed on our website
- Client online trading Your clients can trade on the platform if you've requested trading access for their account (see panel on the next page)
- Regular investing Clients can make regular investments by Direct Debit monthly, quarterly, half-yearly or annually for no extra charge. For exchange-traded assets, the minimum investment allowed is the amount of the last-known whole asset price
- Bed & ISA facility Special arrangements can be made to allow investments to be sold and repurchased within a tax-efficient Individual

- Savings Account (ISA) at the tax year-end. We'll let you know when this is available
- Intraday exchange dealing As a member of the London Stock Exchange, we can offer real-time dealing on securities such as exchange traded funds (ETFs), investment trusts and real estate investment trusts (REITs) giving you flexibility to have deals executed throughout the day

#### Reporting and keeping track

- Audit trail View a full audit trail online for each transaction and movements of cash and assets within each client's account. You and your clients can also view a full transaction history of each account or asset held
- Documentation View, print and download all contract notes, valuation statements and tax vouchers online for a client's whole history on the platform
- Memo assets function For a complete picture of a client's net worth, memo assets lets you add details of assets that cannot be physically held on the platform, such as antiques, property and legacy financial products



#### Financial planning tools

We've brought together a suite of tools from leading third-party specialists to cover both your pre- and post-sale needs. The following tools are included on the platform at no extra charge:

- Fund research centre Tools in the Fund
  Research Centre include: fund search and fund
  comparison, panel manager, portfolio builder,
  portfolio x-ray, Fund literature includes interactive
  fund fact sheets, reports and accounts, key
  features, simplified prospectuses in PDF format
  and insured fund literature
- Charges calculator A consolidated illustration tool that shows the impact of specific fund and platform charges on an investment's Ongoing Charges Figure (OCF) and Reduction in Yield (RIY). This includes the MiFID II requirement for advisers to provide total cost and charges disclosure
- Income forecaster Lets you provide your clients with an indicative view of the natural income that a portfolio may produce over a 12-month period
- Client illustration tool Provides illustrations showing the impact of charges on investment performance for General Investment Accounts (GIAs), ISAs and Self-Invested Personal Pension investments (SIPPs)
- Client portfolio report A tool that harnesses the extensive data available on the M&G Wealth Platform and turns it into a client-friendly report

- Client waterfall report Provides an itemised breakdown of activity and charges incurred through the platform, between an opening and closing date of your choice, at either individual account or total portfolio level. Performance, net or gross of charges, is reflected simply with one overall figure
- Capital gains and loss report Provide your clients with a view of their gains and losses in relation to their GIA(s), to help with Capital Gains Tax (CGT) planning

### Paperless processing

We've made opening accounts and setting up new tax wrappers on the platform as simple, secure and easy as possible for you and your clients.

E-signatures – Apart from in a few instances, our new business application is all done directly online so you have absolutely no paperwork. And with online customer signature through our integrated DocuSign facility neither does your client.

#### Cash accounts

Client cash account – When your client opens an account with us, we open a cash account within it. This can be used to set cash aside for charges and income payments. It is excluded from portfolio rebalances. See Section 6. Investment range, tax wrappers and outsourcing for more information

#### What platform functionality can you give clients?

If you give your clients access to the platform, they can log in to see:

- Account investments including their cash position
- Transactions in progress
- Transaction, withdrawal and payment history
- · Fees and charges

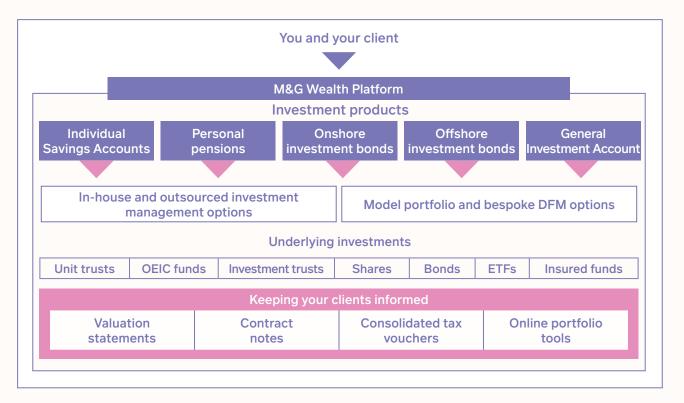
If you choose to, you can give a client trading access - allowing them to buy and sell investments online.

Depending on the proposition you've chosen (see <u>Section 4. Here to support your client proposition</u>), the client can view the platform in your branding or M&G Wealth branding.

#### Investment choice

### 6. Investment range, tax wrappers and outsourcing

With integrated access to a wide and completely unbiased range of investment options, tax wrappers, stockbroking facilities and cash management options through M&G Wealth Platform, you can build client investment solutions yourself – or outsource to a range of best-of-breed specialists.



### Investment range

Access a universe of investment opportunity driven by the needs of advisers and their clients, including:

- Over 3,800 collective funds such as unit trusts and open-ended investment companies (OEICs) from more than 330 asset managers
- Over 2,800 securities traded on recognised investment exchanges, including ETFs, investment trusts, company shares (equities), venture capital trusts (VCTs), REITs, corporate bonds, UK government gilts and insured, insured funds
- Structured products from a range of fund managers
- Over 100 DFMs see more on the next page

All investments are vetted to ensure they meet our risk and operational criteria. Should you want to access a fund we don't currently offer, let your BDM know and we'll look to add it to the platform, subject to our vetting criteria.

### Tax wrappers

Optimise each client's tax-planning opportunities, through our own ISAs plus a wide range of pension solutions and investment bonds from some of the biggest and most experienced providers in the market

- GIA For 'unwrapped' assets held outside of an ISA, pension or investment bond
- ISA Available as our in-house Stocks and Shares ISA or Junior ISA

- SIPP The in-house M&G Wealth Pension Account provides all the benefits of a SIPP as well as the option to use FlexiAccess Drawdown (FAD) and Uncrystallised Funds Pension Lump Sum (UFPLS)
- Third-party SIPPs A range of third-party SIPPs to accommodate diverse investment preferences and retirement planning needs
- Small Self Administered Schemes (SSASs) We offer SSASs from a range of firms to provide flexible retirement planning for business owner/ directors
- Section 32 buyouts Our Section 32 Transfer Pension Portfolio allows existing Section 32 or other types of deferred annuity contract or benefits in a winding-up occupational pension scheme to be transferred to a flexible pension plan
- Offshore bonds Quilter International, Friends Provident International, Utmost (including Aegon International and Aviva International), IOMA and Canada Life International
- Onshore bonds The platform hosts onshore bonds from HSBC
- Access to a range of smoothed funds which are not available from any other platform service provider

You can find a full list of the product partners that we work with on our <u>website</u>

#### Cash accounts

When a client opens an account on M&G Wealth Platform, we open a cash account within it. This can be used to hold money pending investment, set cash aside for charges, and receive income payments from investments. The cash account can be excluded from model portfolio rebalances.

Money in the cash account is held with a range of banking groups authorised in the UK by the Prudential Regulation Authority, to provide diversification in the event a bank fails and maximise client protection.

Cash held in the cash account will, where applicable, earn interest from the day it has been identified as relating to the account and has been credited to the account.

Uninvested cash is protected under the Financial Services Compensation Scheme (FSCS) up to the maximum the FSCS allows per client and bank with whom the client money is held. Please check the FSCS website for the current maximum compensation limit.

#### Stockbroking service

We're one of the few platforms with its own in-house exchange dealing desk. As a member of the London Stock Exchange, we can deal intraday rather than being limited to placing bulk trades once a day.

This allows us to give you more control over when you buy or sell. We can also generate significant savings for your clients from the bid offer spreads we can secure in the market. Plus, our all-inclusive charging structure means there are no additional costs for direct market trading, which is unique in the UK platform market.

### Building your own model portfolios

Our model portfolio functionality allows you to build and manage a range of model portfolios for use with your clients. We can support advisers running both advisory and discretionary models (subject to having appropriate permissions).

#### **Outsourcing investment**

Where you want to focus on your core financial planning expertise, we make it easy for you to outsource investment management to third parties while fully protecting your client relationships.

#### **Discretionary fund managers**

We were one of the first platforms to host model portfolios managed by third-party DFMs. Today, we host around 100 DFMs on our platform, ranging from the biggest brands to specialist boutiques. DFM services include:

- Model portfolio service (MPS) With access to a wide universe of assets, inclusive pricing and inhouse stockbroking, our platform enables DFMs to offer wide-ranging and sophisticated readymade model portfolio services that are highly cost competitive
- Bespoke DFMs We're one of a small number of platforms that can support bespoke DFM services. For clients with more complex needs, a number of our featured DFMs can build bespoke solutions, enabling you to manage more of your client segments in one place

Where your preferred DFM isn't available, either on a model portfolio or bespoke basis, we'll look to include it subject to reaching agreement with the DFM.

#### Charges

# 7. Simple, transparent charging

Our transparent, all-in pricing is designed to make it easier for you and your clients to understand the total cost of ownership (TCO) without having to worry about additional, unexpected costs building up over time.

### Our platform charge

All-in charging means we don't charge fees for any trading – including our in-house stockbroking

service – or any additional fees for our model portfolio functionality. There are also no additional charges for our SIPP, income drawdown, or for adhoc administration services either.

Fund managers, DFMs or third-party product providers might charge separately to use their funds, services or product.

Annual platform charges					
<b>0.30%</b> On assets up to and including £1m	O.10% On assets from £1m up to and including £3m	0.06% On assets from £3m up to and including £5m	On request Assets above £5m		
Minimum charge: £15 per month					

How platform charges are applied – Platform charges apply to all the investments and cash in a client's account(s), including any investments suspended from trading. Separately, interest will be applied to cash in their cash accounts. Details can be found on our website.

Family linking – Your clients can further reduce platform pricing if they and other family members hold their investments with us. We'll add all their investments, assets and cash together so they can take advantage of the lower platform charges for larger portfolios – and apply charges proportionately to each family member.

#### Financial adviser charges

M&G Wealth Platform supports a range of adviser charging structures. Advice charges can be taken upfront, on an ongoing basis as a percentage of assets under administration (AUA) or as a flat charge amount.

Our systems give you flexibility to choose the level of charging within decency limits. Adviser charges typically range as follows:

Initial	0 - 3%
Ongoing	0 – 1%

You can apply different advice charges for different asset types if you wish, such as investments versus cash. All advice charges must be agreed with the client and we must have this confirmation in writing in order to start collecting charges from the client's cash account.

#### In-house dealing

There are no extra fees for our award-winning stockbroking service providing unlimited trading access to shares, ETFs, investment trusts and bonds.

#### How charges are taken

**Platform charges –** The platform charge is deducted monthly in arrears.

**Financial adviser charges** – As agreed by you with the client, adviser charges are deducted from the client's cash account. Initial charges are paid out weekly and ongoing adviser charges are paid monthly in arrears.

Meeting charges shortfalls – Advisers are responsible for ensuring that enough uninvested cash is held in client portfolios to pay the platform and adviser charges. If there is insufficient cash to pay a charge then we will sell investments to generate the cash holding, generally from the largest available daily traded investment downwards.

### **Charges calculator**

Our consolidated illustration tool lets you calculate the impact of specific fund and platform charges on an investment's Ongoing Charges Figure (OCF) and Reduction in Yield (RIY). This can help you to comply with MiFID II requirements on total cost and charges disclosure.

What charges apply to clients on M&G Wealth Platform				
Client account and cash accounts				
M&G Wealth platform charge	Financial adviser charges	Third-party product, fund manager and DFM charges		
No additional charges for: stockbroking service, ISA, tax wrappers, income drawdown, exit fees				



#### Support and training

# 8. Your M&G relationship, technology and training

We aim to build a truly collaborative relationship with you, providing service and support that's responsive, practical and built around understanding your business. With named specialists to support you day-to-day, you can get on with doing what you do best.

### How we support you

We provide a comprehensive team of specialists to support you both when you introduce M&G Wealth Platform to your business and on an ongoing basis.

Your BDM – We'll assign a BDM to help you explore using the M&G Wealth Platform for your business. They'll discuss your requirements in detail and be your point of contact for all ongoing aspects of your relationship with us. We have regional and telephone-based teams so you can be assigned a BDM based on your location and specific requirements.

Platform Consultants – If you decide that M&G Wealth Platform is right for you and your clients, your BDM will arrange for one of our dedicated Platform Adoption Consultants (PAC) to work with you to integrate the platform into your business. They can provide the technical knowledge to ensure your firm and your clients maximise the benefits of the platform.

Platform Adoption Team – Our dedicated telephone-based team is available to discuss how the platform can support your business activities and to provide training and ongoing support. For day-to-day technical or servicing enquiries, we also have a telephone-based Client Services Team.

### Training and guidance

The M&G Wealth Platform is designed to be simple and intuitive to use from day one. But we also provide training to help everyone in your business make the most of its features and services.

**Training** – We use online technology and our Platform Adoption Team to provide you and your team with real-time training in how to use the M&G Wealth Platform.

**User guides** – You can access a range of support materials on the platform.

The M&G Wealth Platform onboarding process					
Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Your assigned BDM discusses your needs in detail and how M&G Wealth Platform can help.	If you decide it's right for you, a PAC is assigned to integrate the platform into your business.	An implementation workshop to identify your needs and agree workstreams.	Your PAC oversees the integration.	Real-time online training on the platform is delivered via Microsoft Teams.	Ongoing business and technical support is available from your BDM and our telephonebased teams.

#### **Technology requirements**

Our platform technology – Our core back office technology is Sonata, provided by Bravura. We integrate with other leading software applications. We have complete control over the user experience so we can implement improvements to the user journey, adviser-branded output and model portfolio functionality.

### Integrating with your business

- Our flexible platform interface enables efficient integration of external support services including back office systems
- We offer integration with all major financial planning and wealth management technology systems including IRESS, Intelliflo, Time4Advice, and Salesforce

#### **Documentation**

A full suite of documentation including Terms, Charges, Key Features, Order Execution Policy and application forms is available on the platform Your clients can view the Terms, Key Features and Platform Charges through the platform or our <u>website</u>

#### **Availability**

- We aim to make the M&G Wealth Platform available 24 hours a day, seven days a week for both you and your clients, apart from scheduled maintenance
- We strive to undertake maintenance outside the hours of 8am to 8pm, Monday to Friday. Where reasonably possible we will provide you with advance notification
- Our Client Services Team is available Monday to Friday, 8:30am to 5:30pm

#### **Accessibility**

Client communications can be made available in large print, braille and spoken word

#### **Our Service Excellence standards**

We aim to deliver dependable and consistent service every time you deal with M&G Wealth

Build trust - we'll do what we say we will

Get things right first time - but if we get something wrong, we'll take responsibility and fix it

**Get things done quickly** – we aim to respond to queries within 48 hours

Help you get the best out of the platform – when you need a bit of extra training, we'll give you a dedicated contact

Keep you up to date - we'll tell you when things are going to change so you know what's coming

Offer proactive support – to help manage any client queries or concerns

Offer personalised care – for non-standard service issues

### Regulatory support

# 9. Meeting your compliance needs

By providing a full audit trail for each client account we make it simple to report to the regulator, demonstrate platform and investment suitability and provide comprehensive reporting to every client.

#### Regulatory client reporting

M&G Wealth Platform provides a full audit trail for each client account as well as a comprehensive Management Information (MI) reporting suite including:

- the functionality to report at any business level: by client, adviser, administrator, firm proprietor, head office, compliance, network function, product partner, DFM and fund manager
- access to latest valuations, statements and transaction records, with both portfolio level and granular reporting
- a variety of reports and data including:
  - Historic valuations a snapshot of your clients' holdings on any given date
  - Contract notes details trades confirmed in the client's portfolio either by you or the client
  - Financial adviser client assets details all your clients' assets held in their portfolios
  - Financial adviser AUA details the total assets held by your firm
  - Available ISA subscriptions by client lists client names and details the amount available for subscription in the current tax year
  - Uninvested cash balances details the available cash balances for each of your clients

All these reports are available in user-friendly, exportable formats that can be integrated into your client reports and adviser software solutions. Regular valuation statements and annual consolidated tax vouchers are sent directly to, or accessed online by, account holders. The information in these documents is available for you to view online. All contract notes are also stored electronically against the client record online and can be printed as required.

#### Meeting MiFID II requirements

To meet your obligations as a financial adviser under MiFID II:

- We share target market data on our platform and products, such as our GIA, ISA, JISA and SIPP, with advisers to help demonstrate suitability
- Target market data on the funds and wrappers on the platform are available from the product manufacturers
- In addition to the pre-sale costs and charges information provided via our charges calculator, we also provide an annual costs and charges statement for each client

#### PROD suitability requirements

To help ensure product suitability for clients under the FCA's Product Intervention and Product Governance Sourcebook, known as PROD:

- We offer flexibility of investment solutions, inhouse trading capability and access to one of the broadest ranges of investments and wrappers in the market
- This ensures we can support a wide variety of client segments and even cater for a 'segment of one' if required
- Key areas of the platform such as client reporting also support the creation of structured, documented processes around your Centralised Investment Proposition (CIP) and Centralised Retirement Proposition (CRP)

#### Managing conduct risk

Ensuring we treat our customers fairly sits at the heart of everything we do as a business. Our Conduct Risk Policy includes the following:

- Directors and the senior management team instil a culture orientated around our customers and client outcomes
- If we find errors we promptly correct them and learn from our mistakes

#### Risk control

# 10. Comprehensive risk controls

We take extensive measures and invest in cutting edge systems in order to keep your client data and money secure, protect the platform against malware and cyber attacks and keep our service running smoothly in every eventuality.

### Keeping personal data secure

We have an Information Security Policy to preserve the integrity and confidentiality of information while maintaining system and application availability.

The policy combats the following security threats: computer-assisted fraud, espionage, sabotage, computer viruses, internal errors/control issues, computer hacking, denial of service attacks, vandalism, fire, flood or other natural disasters.

Full details of our Privacy Policy with respect to our clients can be found on our website. We also have an Adviser Privacy Policy relating to advisers' own personal data. Both are available on the <u>documents</u> and <u>forms</u> page of our website.

The main points are as follows:

- We will treat all information provided by you or your clients in the strictest of confidence and in accordance with current legislation
- Under general data protection legislation, you and your clients have the right to obtain a copy of the personal information we hold on them/you

#### Our online security systems

- We take the security of our platform very seriously and perform regular vulnerability scans and penetration tests to minimise the window of opportunity for online attackers
- Our malware defences use automated tools to enable speedy deployment of defence and corrective actions
- We maintain an incident response management system to discover any attack quickly, contain the damage and restore the integrity of our network and systems
- Security information and event management tools are in place and our systems are hosted by in-house secure data centres with robust access controls
- Our data protection software ensures the privacy and integrity of sensitive information. We also operate a number of boundary defences, such as intrusion prevention systems, firewalls and web application firewalls
- Personal information provided on the website is transmitted through a secure channel using secure socket layering (SSL) encryption technology

This statement should be read in conjunction with the full Terms, which you can find on our <u>website</u>

#### Protecting your clients' money

In accordance with the 'Records, accounts and reconciliations' section of the FCA Handbook, M&G Wealth Platform reconciles client cash accounts daily where they are used for day-to-day transactional business, with other accounts reconciled monthly.

Your clients' cash is placed with a range of banks regulated in the UK by the Prudential Regulation Authority. Due diligence is performed when a new banking relationship is started and annually thereafter to ensure selected banks are financially sound. This diversification helps protect client money from the insolvency of a single banking partner and may also increase the FSCS compensation clients receive if multiple banks become insolvent.

In the event of any of the banks we use becoming insolvent, any money we hold for your clients is protected under the FSCS, up to the maximum the FSCS allows per client and bank with whom the client money is held. Please check the FSCS website for the current maximum compensation limit. This limit is applied to banks that are separately authorised and can only be applied once. Therefore banks operating under different brands within the same authorisation are covered under the same limit.

The FSCS compensation limit includes any other money held by your client in accounts with the authorised banks we use. Therefore, if your client has current or deposit accounts with the same bank these will all count towards the compensation limit. For more information about the protection provided by the FSCS visit their website: <a href="https://www.fscs.org.uk">www.fscs.org.uk</a>

Should an underlying bank fail financially, your clients' cash remains segregated and is governed by the CASS 7A 'Client money distribution and transfer' section of the FCA Handbook.

#### Internal and external audits

M&G Wealth Platform is audited annually by our external auditors, PwC. And internally by the M&G plc group wide internal audit department.

#### Internal Capital and Risk Assessment (ICARA)

This document sets out our disclosures on capital and risk management in line with regulatory requirements. It can be accessed on our website.

#### **Conflict of Interest Policy**

Our conflict of interest policy is designed to ensure that conflicts are appropriately identified, reported and managed.

#### Disaster recovery plans

To protect data and operations against system breakdowns, attacks or other emergencies, we have two data centres where data is mirrored between sites and we hold external backups of data. We also have a work area recovery site where we can relocate in the event our main operations are impacted in an emergency. We also perform internal and external security testing.

If you would like to know more about our security measures, please get in touch.

#### Winding up procedures

**If M&G Wealth Platform ceased operating –** Assets are held in a nominee company.

The nominee company is dormant (i.e. is non-trading) and owned 100% by Investment Funds Direct Limited (IFDL) solely for the purpose of registration of custody assets. Client money is held in client money bank accounts in the name of IFDL.

If M&G Wealth Platform ceased operating, custody assets will remain segregated from M&G Wealth Platform assets and any administrator will be able to return them to the client as part of the winding up process.

If the M&G Wealth Pension Account (SIPP) was wound up – Should our SIPP be wound up for any reason, the winding up will be performed by the trustees of the SIPP in accordance with the scheme rules. Winding up a pension scheme can be a lengthy and complicated legal process, but the trustees of the scheme are legally bound to act in the best interests of the scheme members.

Winding up the scheme would involve valuing the scheme's assets and calculating transfer values for individual clients to allow them to make choices about where to place their pension. The MoneyHelper website <a href="moneyhelper.org.uk">moneyhelper.org.uk</a> provides significant detail on the protection of pension scheme assets on wind up.

As the M&G Wealth Pension Account is a SIPP, many of the issues around affordable benefits will not apply to client assets in the scheme.

If a fund manager or insurer is wound up – If your investment provider fails financially, as long as you have selected one covered by the FSCS, your investment with that provider will be covered by the scheme. The fund prospectus, or similar document, will tell you if your investment provider is a member of the scheme. Such investments should be covered up to a limit of £85,000, per provider. Insured Funds, covered by FSCS, receive protection of 100% of the investment and are not subject to an upper limit of protection. The FSCS does not protect you against losses if the investment were to fall in value.

#### Our complaints procedure

In the majority of cases, we aim to resolve any complaint received by email, post or telephone at the point of initial contact.

Where the complaint can't be resolved at the first point of contact, it will be handed to our complaints team for further investigation. We endeavour to complete an investigation and issue a response as soon as possible. We have a total of eight weeks following receipt of the complaint to do this.

During this time we will acknowledge the complaint within five working days and if we have not completed our investigation within four weeks following receipt, we will provide you with an update of our investigation.

Full details of our complaints procedure can be found  $\underline{\text{on our website}}$ .

#### **Appendix**

# Frequently asked questions

#### Do you outsource any service functions?

All of our core service and administration elements are provided in-house by our employees. Some specialist administrative functions, such as the printing of consolidated tax vouchers and illustration tools, are outsourced to specialist companies.

# Where can I view your full terms and disclosure documents?

Our full suite of documentation including Terms, Charges, Key Features and Order Execution Policy is available on our website or on the platform.

#### Do you offer re-registration of client assets?

Where available, we fully support re-registration of client assets onto and away from the platform at no extra charge. If necessary, we will request a conversion of share classes with a ceding provider or perform a conversion on instruction from a receiving provider to enable the re-registration to take place.

# Can I move a client's assets off your platform?

Most business placed with us isn't tied to M&G Wealth Platform. Your clients are free to move their assets on request and at no extra charge.

# How do I move a client's assets off your platform?

Where available, to transfer out we simply need to receive an instruction from your client. We offer electronic transfers to make this a smooth and simple process and you can track the progress of your client transfers.



### **Appendix**

# **Checklist: Meeting FCA considerations**

The FCA has published a number of communications over the years outlining core considerations when choosing an investment platform for your adviser business. This table gives an overview of our position for each consideration.

Consideration	M&G Wealth Platform
Reputation and financial standing	<ul> <li>M&amp;G Wealth Platform is a wholly-owned subsidiary of M&amp;G plc – the international savings and investment business</li> <li>With a history stretching back more than 170 years, M&amp;G plc has a long track record of innovating solutions to meet its customers' changing financial needs</li> <li>Today, it has two investment businesses that between them operate across 28 countries. M&amp;G Investments offers global asset management, including platform and intermediary services through M&amp;G Wealth. Prudential provides long-term savings, investments and retirement solutions</li> <li>Together these businesses manage or administer £370bn in assets* on behalf of clients ranging from individual savers to major pension funds and insurance companies</li> <li>As at September 2021, M&amp;G plc's financial strength is rated A+ by Standard &amp; Poor's (outlook 'stable'), Aa3 by Moody's (outlook 'stable') and AA- by Fitch. Its Solvency II coverage ratio is 198%</li> <li>M&amp;G Wealth Platform is rated B+ by AKG</li> </ul>
Terms	Our Terms can be found on our website
Actual cost charging structure and transparency of charges	<ul> <li>M&amp;G Wealth Platform's charging structure supports the FCA's direction of building transparency within financial services</li> <li>Adviser charges, both initial and ongoing, are agreed by you with the client</li> <li>We support both pre and post-sale MiFID II disclosure requirements, through our charges calculator and our Annual Summary of Charges</li> </ul>
Funds and tax wrappers	We provide a comprehensive range of investment funds and wrappers to support a client's financial planning throughout their life:
	<ul> <li>Retirement planning – our own SIPP, plus a number of third-party SIPPs, SSASs and Section 32 schemes</li> <li>Inheritance and tax planning – range of offshore bonds and onshore bonds</li> <li>ISA</li> <li>GIA</li> <li>Access to over 3,800 funds and access to ETFs, investment trusts, bonds, shares and cash</li> <li>Member of the London Stock Exchange and offer intra-day dealing at no cost</li> </ul>
Investment options	<ul> <li>Collective funds, ETFs, investment trusts, shares, bonds, insured funds and cash</li> <li>A range of multi-manager funds</li> <li>Model portfolio functionality</li> <li>Investment outsourcing through more than 100 DFM partners</li> </ul>

<sup>\*</sup> As at end September 2022

Consideration	M&G Wealth Platform			
Functionality	<ul> <li>Flexibility to build your own models or outsource to model or bespoke portfolios from leading DFMs</li> <li>Flexibility to manage cash according to your proposition. You can use the cash account to ring-fence cash for charges and income payments. Or you can use a model with a cash allocation and let the automated disinvestment functionality take control</li> </ul>			
Accessibility	we aim to make M&G Wealth Platform available 24 hours a day, seven day for both you and your clients, apart from scheduled maintenance  We look to undertake maintenance outside the hours of 8am to 8pm, Mon-Friday. Where reasonably possible we will provide you with advance notific Our Client Services Team is available Monday to Friday, 8:30am to 5:30pm			
	As part of our commitment to accessibility, we er  Recent versions of popular screen reade  Operating system screen magnifiers  Speech recognition software  Operating system speech packages			
Useful tools	The platform hosts a comprehensive range of a companies covering asset allocation, fund selections			
Training and support services	We offer a comprehensive service to integrate M&G Wealth Platform into your business, provide remote online training for your advisers and ongoing support to help your business optimise the benefits of our platform service and technology.			
Technology	<ul> <li>Our core technology is Sonata, which is provided by Bravura. We integrate to leading software applications and have complete control over the user experiments means we can swiftly implement improvements to the design and inversion journey as and when required</li> </ul>			
	The flexible platform interface enables efficience services including back office systems. The plant and white labelling is also available	=		
Compliance needs	The platform can be used to generate a range o compliance and day-to-day management needs			
Customer service	Our Client Services Team is available Monday to	Friday, 8:30am to 5:30pm.		
Risk control	Formal risk controls include an ICARA and both Capital disclosure is available on our <u>website</u>	internal and external audits. Our Pillar 3		
Conflict of interest	Our Conflict of Interest Policy is designed to ensure that conflicts are appropriately identified, reported and managed.			
Cost	We offer all-in pricing, with no additional trading	g, account or administration charges:		
effectiveness	On assets up to and including £1m On assets from £1m up to and including £3m On assets from £3m up to and including £5m On assets above £5m	0.30% 0.10% 0.06% On request		
	Minimum charge	£15 per month		



M&G Wealth Platform Our platform, your way

#### Contact us:

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The M&G Wealth Platform is provided by Investment Funds Direct Limited, registered in England and Wales No.1610781. Registered office: 10 Fenchurch Avenue, London EC3M 5AG. Authorised and regulated by the Financial Conduct Authority No. 114432.

Investment Funds Direct Limited is a subsidiary of M&G plc, incorporated and registered in England and Wales. Registered office: 10 Fenchurch Avenue, London EC3M 5AG. Registered number 11444019. M&G plc is a holding company, some of whose subsidiaries are authorised and regulated, as applicable, by the Prudential Regulation Authority and the Financial Conduct Authority.