

Key Features of the Select Pension Account

Select Platform

November 2023



Marlborough

01. Introduction

Our Select Pension Account provides you with a simple, tax-efficient way to invest your savings ready for retirement. You will be able to access your Select Pension Account how and when suits you, but it will be subject to Government rules and regulations.

We are required to give you important information to help you to decide whether this pension is right for you. This document will help you understand the key features of our pension and provide answers to common questions, so please read it carefully and keep a copy.

This key features document gives a summary of the Select Pension Account. It does not include all the definitions, exclusions, terms and conditions. The full contractual terms are set out in the Trust Deed & Rules and the Terms and Conditions. If you would like copies of these, or clarification of any of the information provided in this document, please ask your Adviser, or contact us.

We have the right to change some of the terms and conditions. In this circumstance, we will write to you to explain the reasons for any such changes. If you have any questions, please get in touch with us.

02. Aims of the Select Pension Account

The pension is designed to help you:

- Save for retirement in a tax-efficient and flexible way.
- Take control of your pension fund investments through a wide range of investment choices.
- Make decisions either by yourself or with your Adviser.
- Take benefits at retirement in a flexible manner.
- Specify to whom you would like benefits to go to on your death.

03. Your commitments

When you open a pension, you commit to:

- Take time to read this information and any other documentation we provide to you.
- Make at least one contribution or transfer another pension into your Select Pension Account.
- Be aware that you and your Adviser (if you are using one) are responsible for deciding which investments are right for you, and whether these should be amended during the life of your pension.
- Make sure we always have up-to-date information about you and tell us if things change - like if you move to a new house, change your bank account or email address.

- Remember that you won't ordinarily be able to take money out of your pension until you are at least 55 (rising to 57 from 6 April 2028). You should be okay with this and see investing as a long-term solution.
- When you come to withdraw money from your Select Pension Account, you will need to make sure you are doing so in ways that are allowed under the pension and tax rules that apply at that time.
- Notify us if you are no longer entitled to tax relief on the contribution you make to this or any other pensions.
- Read and adhere to the Terms and Conditions of the Marlborough Select Platform.
- Pay our fees for administering the pension on your behalf.

04. Risk factors

Please read these carefully, they could affect your expected income on retirement. We do not offer advice on the suitability of the Select Pension Account for your needs or your options at retirement. You must appoint and seek advice from your Adviser.

Many things could happen which could have an impact on the level of retirement income available from your pension. You should review your pension arrangements regularly with your Adviser to check that they remain suitable and to ascertain whether the Select Pension will continue to meet your retirement needs. You should note the following:

Risk Factor	Description	Whilst saving	Whilst withdrawing
The value will go up and down	The value of your Select Pension Account depends on the performance of the underlying investments. The value of these investments, and therefore your pension, can go down as well as up. Past performance, projections and illustrations are not a guarantee of what your performance will be. If your investments perform badly, it's possible you may get back less money than you put in - no retirement benefits are guaranteed.	Yes	Yes
Your retirement income could be lower than expected	Your retirement income could be less than you expect if you reduce or stop payments, investment growth is poor or annuity rates at the time you take your benefits are lower than expected.	Yes	Yes
Different pensions have different benefits	If you transfer another pension plan to us, the pension benefits you receive could be lower than if you stayed in your existing scheme. If you are unsure on the decision to transfer, your Adviser may be able to advise you whether it's in your best interests and make clear any benefits you may be giving up such as 'Guaranteed Annuity Rates'. Please also refer to the section entitled 'Can I transfer other pensions?' on pages 7 and 8.	Yes	No

Risk Factor	Description	Whilst saving	Whilst withdrawing
Fees will affect your pension value	Any fees taken will affect the value of your Select Pension Account. These charges may vary from time to time, and we will notify you if this is the case. You can find more information about fees and how they are taken in the Marlborough Platform Terms and Conditions. You will also be given a Key Features Illustration, showing the effect of charges. In the rare cases that we cannot pay fees from your Select Pension Account due to an insufficient cash balance, we would need to sell other investments to meet these.	Yes	Yes
Inflation can reduce the value of your money	Inflation means the cost of goods and services increasing over time. This has the effect of reducing the buying power of the money you have saved. A £10 note will still be worth £10 in five years' time, but you might not be able to buy as much with it.	Yes	Yes
Tax charges may apply	The Government sets rules on the amount that you can save into a personal pension each tax year and receive tax relief on. This is known as the Annual Allowance. Your Annual Allowance is also dependent on how much you earn and may be less than the standard allowance. The Government also has a rule to limit the total amount of tax-free cash you can hold in your personal pension overall, which is known as the Lifetime Allowance. If you exceed the Annual Allowance or the Lifetime Allowance limits, you may need to pay tax. Please note that the tax treatment of your pension is set by HM Revenue and Customs ('HMRC') and may change over time	Yes	Yes
Retirement Income	If you take a large proportion of income in a short period, you may end up paying a higher rate of tax than usual.	No	Yes
	Whenever you start to take a retirement income, 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 pensions each year.	No	Yes
	If you take a higher than planned level of income over a long period of time, it is likely that your Select Pension Account will not be enough to provide an income for as long as you may have originally wanted.	No	Yes
	If you receive means tested benefits, taking an income from your Select Pension Account might mean they are reduced or stopped.	No	Yes

05. Your questions answered.

What is the Select Pension Account?

The Select Pension Account is a pension plan that allows you to save for retirement in a tax-efficient and flexible way. The benefits you can receive are subject to UK pension legislation. This includes rules about limits on contributions that can qualify for tax relief, the earliest age you can take benefits and limits on what those benefits can be without incurring tax penalties, including the amount that can be taken as tax-free cash payments.

Whilst you are saving for your retirement, your Select Pension Account will be an uncrystallised fund which means that you have not taken any benefits from it.

Once you start to withdraw from your Select Pension Account, some funds will become crystallised and these funds will be held under a separate account reference on the platform so that you can easily recognise them.

Who can open a Select Pension Account?

This product is for people who want to:

- Invest in a range of assets
- Make investment decisions about their pension assets themselves or with their Adviser or investment manager
- Withdraw an income while continuing to make investment decisions about the remaining assets

The Select Pension Account is unlikely to be appropriate for people who won't take advantage of the flexibility it offers in terms of the choice of available investments, or the way benefits are taken. You should consider speaking to your Adviser about the most suitable pension option for you.

Who will administer my Select Pension Account?

Seccl Custody Limited will administer your pension in accordance with the Trust Deed and Rules. This includes the day to day running of your pension, ranging from processing contributions, transfers, investments and paying benefits, to ensuring the pension adheres to HMRC rules and regulations.

Is the Select Pension Account a stakeholder pension?

No. Stakeholder pensions must meet government set standards covering payments, charges and other terms and conditions. Stakeholder pensions are generally available and might meet your needs as well as our Select Pension Account.

Will I have a separate Select Pension Account bank account?

No. Uninvested cash is held in a client money account, this is a pooled account so that in the event of a bank's failure your claim will be a share of the cash held in all such accounts held at the bank.

Is this the right option for me?

This could be right for you 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
- Want to start taking retirement income.

The scheme administrator, Seccl, nor Marlborough Select Platform will offer or provide any financial advice.

Your adviser will advise on whether to invest in, and how much to invest in, our Select Pension Account.

How do I start saving in the Select Pension Account?

Your Adviser will open an account for you.

How do I pay in to my Select Pension Account?

You can choose to make contributions as either:

- Single payments
- Regular payments

These are payable by:

- You (via bank transfer or direct debit)
- Your employer (via standing order)

You can stop paying at any time or take payment holidays and restart payments later. Remember though that stopping payments, even temporarily, will reduce the possible value of your pension account at retirement.

Do I get tax relief on my contributions?

Yes, you do. If you are under the age of 75, you receive tax relief on all personal contributions made by you or by another individual on your behalf. You pay the contribution to us net of basic rate tax (20% for 2023/24). For example, if you pay a net contribution of £80, we will reclaim £20 from HMRC and credit it to your Select Pension Account within 11 weeks.

Employer contributions are not taxable as a benefit in kind for you and the employer will normally get tax relief on employer contributions as a business expense. Therefore, you do not get tax relief on employer contributions.

How much can I save in my Select Pension Account?

There is no minimum or maximum limit on how much you can put in. There are government limits on the amount of contributions that are eligible for tax relief, and you may have to pay tax if you exceed the Annual Allowance. This is explained later.

All relevant UK individuals can pay, and get tax relief on, contributions up to £3,600 gross each year. Where your earnings are in excess of £3,600 you may make gross contributions of up to 100% of your earnings known as UK relevant earnings subject to a maximum amount known as the Annual Allowance, which is set each year by the Government. The Annual Allowance applies as a total limit across all of your registered pension schemes in a tax year. It covers:

- Your payments;
- Employer payments made on your behalf; and
- Any increase in the value of retirement benefits you may earn from a defined benefit pension scheme.

If you were a member of a registered pension scheme but did not fully use your available Annual Allowance from the previous three years, you may be able to 'carry forward' that unused allowance.

The Annual Allowance does not include transfers from other pension arrangements. They do not receive extra tax relief, so there is no upper limit on them. The Annual Allowance does not apply in the year of death or severe ill-health.

Any payments over the Annual Allowance will be subject to an Annual Allowance charge at a rate set by HMRC. The amount of tax charged will be your highest marginal rate of tax determined by your individual circumstances based on your income and the amount by which you have exceeded the Annual Allowance.

In some cases, you may be able to make larger contributions in a particular tax year. If you think you may be close to, or exceed, the Annual Allowance you should talk to your Adviser as this is a complex area.

What are the different Allowances?

Annual Allowance

Currently, the Annual Allowance is £60,000 (2023/34). This applies to everyone unless they are subject to either of the reduced allowances described below.

Tapered Annual Allowance

The Tapered Annual Allowance is between £60,000 and £10,000. This applies to those earning 'adjusted income' more than £260,000 and 'threshold income' in excess of £200,000. The Annual Allowance is reduced by £1 for every £2 of earnings over £260,000 up to earnings of £360,000.

Money Purchase Annual Allowance

This is currently £10,000 and applies where you have started taking a retirement income which is liable to tax.

Can I make contributions if I have 'Enhanced' or 'Fixed' Protection?

Protection and lifetime allowance rules have changed. This means that whether you can make contributions without losing protection will depend on when you applied for and were granted either Enhanced or Fixed protection.

Type	Application Date	Contributions allowed
Enhanced/Fixed protection	Before 15th March 2023	Yes
Enhanced/Fixed protection	After 15th March 2023	No

Can I transfer over other pensions?

Yes, you can. If you instruct a transfer, your existing pension provider may need to sell down your investments and transfer the cash into your Select Pension Account, which would then be invested in line with the investment style you picked. Alternatively, if your existing pension provider allows, and the investments are available on our platform, you can instruct that these are re-registered to your Select Pension Account without the need to sell down. This is known as an in-specie transfer. It may take some time for the transfer to fully complete in either scenario.

We will only accept transfers from pensions with Safeguarded Rights, (as defined in Section 48(8) of the Pensions Schemes Act 2015), if an Adviser has advised you that the transfer is suitable for your personal circumstances.

If you are transferring crystallised funds, (you have started withdrawing from your pension), you must transfer the whole of your fund to us. If you are transferring a capped drawdown arrangement, it will automatically be converted to flexi-access on receipt of the transfer.

If you are transferring funds which are still uncrystallised (nothing has been withdrawn), you can choose to transfer all or only a part of that fund to us.

If you transfer the whole pension, it will come to an end.

Any scheme protection, such as a reduced retirement age, could be lost if you transfer. You should speak to Adviser before making a transfer.

What can I invest in?

Your Adviser can choose from a wide range of investments, provided that the investments chosen are allowed by HMRC. The investments acceptable to your Select Pension Account are:

- Investments meeting the FCA's definition of standard and capable of being held by Seccl Custody Limited
- FCA authorised or recognised collective investment scheme or a listed security and capable of being valued on a regular basis and sold within 30 days

This is a complex area and if you have any questions, you should contact either your Adviser or us.

If there is anything else you would like to invest in, please contact us to see if this will be allowed.

Is my pension size limited?

Yes. The maximum you can take from all your pension arrangements is called the Lifetime Allowance, as set each year by the Government without incurring an additional tax charge. If you exceed the Lifetime Allowance, you will be subject to the tax charge.

The excess will be taxed at your marginal rate which will be deducted from your fund and paid to HMRC when paying your benefits.

Every time you take any benefits from your pension, some of the Lifetime Allowance is used up. Checks against the Lifetime Allowance are carried out at various points, including:

- In the event of your death
- Whenever you use part of the fund for tax-free cash and start flexi-access drawdown
- Whenever you use all or part of your fund to purchase an annuity.
- At age 75 (if funds are still invested in the pension)
- When funds from which you have previously been drawing an income are used to purchase a lifetime annuity

At each of the above stages, an allowance is made for any tests that have already been carried out. Income tax is then applied to withdrawals which are over the Lifetime Allowance.

What are the charges?

You will pay an annual Select Pension Account fee, which includes all costs associated with holding the account including payments, withdrawals, trading and custody. On top of this, there are investment costs which include fund charges (taken directly by the fund provider) and market spread (the difference between the price we buy and sell investments).

Please read the Marlborough Platform Terms and Conditions and review your personalised illustration.

Charges are deducted directly from your Select Pension Account.

What might I get back?

At the 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 Select Pension Account is doing?

You can see the value of your investments at any time by signing into your account on the web, or via

<https://investor.selectplatform.co.uk/login>

We also provide you with a regular annual statement showing the value of your Select Pension 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 the secure online document store.

Your statement will also show any income you have taken if you are receiving a retirement income.

Can I transfer out my Select Pension Account?

You can transfer out all or part of your uncrystallised pension to another registered UK pension scheme at any time. Any accounts already in drawdown will have to be transferred in full in line with pension regulations.

If you are in any doubt about the benefits of transferring, we recommend that you seek advice from your Adviser.

How can I take my benefits?

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

Currently the options include:

- Taking retirement income directly from investments in your account, this is known as flexi-access drawdown.
- Taking a tax-free pension commencement lump sum and using the remainder of your account to either buy an annuity or take flexi-access drawdown.
- Taking the whole value of your investments as cash lump sums, 25% as a tax-free lump sum and 75% as income and taxed as such, known as an Uncrystallised Funds Pension Lump Sum (UFPLS). We do not currently offer UFPLS, to access benefits in this manner you will need to transfer your pension to another provider that does.
- Converting your investments into retirement income by buying an annuity from an annuity provider. This option is not available via your Select Pension Account.

Retirement income can be taken as a lump sum single withdrawal (either the whole fund or in part), a series of lump sum single withdrawals or as a regular monthly income.

When can I take benefits?

You can start taking an income from your Select Pension Account from age 55, rising to age 57 from 6 April 2028. You may also be able to take a cash lump sum or income earlier if you are seriously ill or suffer an illness or accident which means you cannot continue in your current occupation.

When you reach age 50, you can use Pension Wise from MoneyHelper, a free impartial government service, to help you understand what your pension income choices are and how they work. This service can be accessed at:

<https://www.moneyhelper.org.uk/en/pensions-and-retirement/pension-wise>.

You should speak to your Adviser or seek guidance from Pension Wise when you are thinking of accessing your pension income.

What happens if I die?

In the event of us being notified 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 the required documentation from your personal representatives that allows us to distribute any proceeds.

We will consider any nominated beneficiaries 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 retirement income either with us or another provider.

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 and the time that it takes for the benefits to be paid. If you die before age 75 and death benefits are paid within 2 years, they will be paid free of tax, subject to current tax rules.

However, if you die on or after your 75th birthday, benefits will be subject to tax at your beneficiary's marginal rate.

In some circumstances there may be a delay in passing the benefits on to your beneficiaries due to the nature of your investments. For example, an investment may be suspended from trading.

06. Cancellation Rights

You have 30 days to change your mind from when we issue your confirmation that your account is open. We will send you a confirmation email each time you make a transfer in which will include details of your right to 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, we will refund any cash payment in full that we have already received as part of regular direct payments you have set up.

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

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

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

If you start trading within the cancellation period, you may be liable for any charges levied by others.

07. How can I make a Complaint?

If you have a complaint, please send us an email to select@marlboroughgroup.com or telephone us on 0117 422 7777. Our lines are open Monday to Friday 09:00 to 17:00.

Your complaint will be handled by a person of appropriate competence and experience. That person will not have been directly involved in the matter which is the subject of the complaint.

We will endeavour to resolve any complaint as soon as possible.

Please refer to our Customer Complaints policy which is available at

<https://marlboroughgroup.com/contact-page#complaints>

Financial Ombudsman Service

Exchange Tower, Harbour Exchange Square, London E14 9SR

Telephone: 0800 023 4567 (call charges will vary)

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

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

The Pensions Ombudsman

10 South Colonnade Canary Wharf, London E14 4PU

Telephone: 0800 917 4487 (call charges will vary)

Email: enquiries@pensions-ombudsman.org.uk

Website: www.pensions-ombudsman.org.uk

08. How safe is my Select Pension Account?

Seccl will only work with global finance service providers who are regulated by the Financial Conduct Authority. As custodians, we hold your cash securely and separately from our own, which means that if we went into administration, our creditors wouldn't have a claim to your investments.

Digital Custody Nominees Limited is the Nominee which is a wholly owned and controlled subsidiary of Seccl Custody Limited, which holds the funds for all pension accounts. Up to the first £85,000 of your money invested with us can be protected by the Financial Services Compensation Scheme (FSCS) in the event of the insolvency of Seccl Custody Limited, or Digital Pension Trustees Limited. However, it's important to understand that the FSCS doesn't cover

you in the event that your investments do not perform as expected and you get back less than you originally invested. For more information visit www.fscs.org.uk/

What is the Financial Services Compensation Scheme (FSCS)?

The FSCS is the UK's compensation fund of last resort for customers of authorised financial services firms. See further information at www.fscs.org.uk/what-we-cover/pensions/.

Seccl is authorised by the FCA so you will have access to the FSCS. In the event you suffer financial loss because of Seccl's failure or an investment failure, the actual level of compensation you receive will depend based on 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 Seccl or any banks with whom Seccl place your money are no longer able to meet their financial obligations. If certain investments fail, you may also be eligible for compensation.

Our current banking partner is Lloyds Bank PLC, and we will inform you if this changes. For more information about how the FSCS might apply to you, please contact us or visit the FSCS website at fscs.org.uk. The FSCS's address is 10th Floor, Beaufort House, 15 St Botolph Street, London EC3A 7QU.

09. How to contact Select Platform

If you require any further information, please contact us.

Website: www.marlboroughgroup.com/contact-page

Email: select@marlboroughgroup.com

Telephone: 0117 422 7777 Our lines are open Monday to Friday 09:00 to 17:00.

How to contact the administration team at Seccl.

Email: SIPP@seccl.tech

Telephone: 01225 435200. Our lines are open Monday to Friday 09:00 to 17:00.

Please do not include any account details when you contact us by email.

Seccl Technology Limited is registered in England and Wales No 10237930. Registered office 20 Manvers Street, Bath, BA1 1JW Digital Custody is a service provided by Seccl Custody Limited who are registered in England and Wales No 10430958. Registered Office 20 Manvers Street, Bath, BA1 1JW.

Seccl Custody Limited, a firm authorised and regulated by the Financial Conduct Authority, registration Number 793200, is a wholly owned subsidiary of Seccl Technology Limited.

Marlborough Select Platform Limited, whose registered office is Marlborough House, 59 Chorley New Road, Bolton, BL1 4QP and whose principal place of business is 33 Colston Avenue, Bristol, BS1 4UA.

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