



Indirect Discretionary Portfolio Management Consumer Duty Information

What is Indirect Discretionary Portfolio Management?

Many advisers recognise the value of outsourcing the investment management function allowing them to focus solely on giving financial advice.

Using our expertise, we will manage a portfolio for the underlying client in line with their individual investment objectives, chosen risk profile and personal circumstances. We can incorporate special instructions from you into the construction of portfolios which could include your providing us with a specific asset allocation and specific income targets, by way of examples.

Key features:

- Whole of market investment universe;
- Tailored to client's specific goals or constraints;
- Flexible and reactive investing;
- Suitable for ISAs, SIPPS, Bonds and other tax wrappers;
- Financial Adviser retains client relationship.

What is the Target Market?

This service is compatible with:

- i. indirect retail clients with more than £75k to invest, both individuals and entities;
- ii. clients who accept we provide restricted advice;

- iii. clients who do not want to be involved in investment decisions;
- iv. clients who understand the risks involved in trying to achieve income/growth but also the risks involved in the financial instruments they will be exposed to. This understanding can be supported by JMF literature, explanations and communications;
- v. clients who have the ability to bear loss and are not entirely reliant on their investment portfolio for their standard of living;
- vi. clients who wish to grow their wealth or create income from their wealth, or a combination of the two;
- vii. clients who wish to invest for at least the medium to long term, which is at least five years;
- viii. clients who wish for J M Finn to have custody of their assets. rulings and therefore there can be no certainty that relief will be granted,

Negative Target Market

This service is potentially incompatible with clients who:

- i. do not have a financial adviser;
- ii. want to have involvement in investment decisions;

- iii. do not accept or cannot understand (even with our support), the risk of investing in stocks and shares within the JMF offering;
- iv. are seeking full capital protection or have no ability to bear loss;
- v. require fully guaranteed income or have a fully predictable return profile;
- vi. are not prepared to accept any level of investment risk;
- vii. wish to invest for a period less than five years;
- viii. are seeking unrestricted advice.

Clients with vulnerability characteristics

This service is compatible with clients who have vulnerability characteristics however, we recognise that an understanding of vulnerability from the investment manager is key to providing a good outcome. Please contact your usual manager to discuss further how best we can provide support and make any reasonable adjustments required.

Fair value

In accordance with the Consumer Duty and as part of its internal governance procedures, JM Finn has carried out an initial Fair Value Assessment of this service and aims to review and update this at least annually, as well as after any significant changes are made. If it is ever determined that our offering is no longer providing fair value to the client, an action plan will be put in place with measurable timescales for remediation, all of which will be shared with you. Where additional charges are incurred by financial advisers and other intermediaries, they will need to be factored into the financial adviser's own value assessment.

The key factors considered in our Fair Value Assessments include:

- The client is in the right service to meet their needs and objectives;
- The client is within the target market for the product/service they are in;
- The offering is transparently sold and well supported;
- The client receives everything from the offering that has been previously agreed;
- The overall client charges are proportionate to the benefits and value the client receives and the costs associated with delivery of the offering.

Distribution Strategy

This service is only available to clients who have taken regulated financial advice from an independent financial adviser.

Important Information:

The value of investments and the income from them can go down as well as up and investors may not get back the amount originally invested.

JM Finn is a trading name of J.M. Finn & Co. Ltd which is registered in England with number 05772581. Registered address: 25 Copthall Avenue, London, EC2R 7AH. Authorised and regulated by the Financial Conduct Authority.