

SIPP Due Diligence

Q3 2020

Ownership

Dentons has been delivering self invested pension expertise for 40 years and has been operating in its current form of Dentons Pension Management Limited (Dentons) since 1989. Dentons Holdings plc owns the company with the majority shareholder being Martyn Rose, businessman and entrepreneur.

Our focus continues to be on delivering exceptional service and flexibility.

We believe we understand the needs and challenges for financial advisers and clients and tailor our services appropriately.

In addition, Dentons has no ties to any fund manager or insurance company, which means the client is able to choose how their pension funds can be invested from an extensive range of asset classes as long as they are compatible with HM Revenue & Customs (HMRC) and the Financial Conduct Authority (FCA) regulations.

Dentons has gained a reputation as a professional and efficient specialist pension administrator and continues to thrive, expand and grow organically through reputation, word of mouth and through suitable acquisitions.

We react appropriately to changes in the marketplace, making it easier for financial advisers and clients to do business with us.

Structure

Dentons is the provider and Scheme Administrator of its Self Invested Personal Pension (SIPP).

Dentons is authorised and regulated by the FCA, register number 461094.

Registered in England, Company Registration Number 2352951.

Registered Office:
Sutton House, Weyside Park, Catteshall Lane, Godalming, Surrey, GU7 1XE.

Dentons is part of the Dentons Holdings Group.

The principal permission granted to Dentons by the FCA is for the establishment, operating and winding up of personal pension schemes.

Whilst authorised to control client money, Dentons is not authorised to hold such funds on its own account.

Dentons' clients are introduced predominantly from Independent Financial Advisers (IFAs) and it is Dentons' philosophy that advice should come from IFAs.

Dentons has four bare trustee companies in relation to SIPPs, the first two act as a co-trustee in a SIPP Sub-trust and the second two act as a sole trustee:

Denton & Co Trustees Limited
Registered in England:
Company Registration Number 01939029.

NTS Trustees Limited
Registered in England:
Company Registration Number 01407848.

TP Trustees Limited
Registered in England:
Company Registration Number 02604059.

Sippchoice Trustees Limited
Registered in England:
Company Registration Number 06869793.

Dentons SIPP Structure

SIPP Provider	Dentons Pension Management Limited (Dentons)
SIPP Trustees	Individual SIPP holder and Denton & Co Trustees Limited
SIPP Trust	Dentons SIPP established under master trust deed Member SIPP established under separate individual Sub-trust
SIPP Administrator	Dentons Pension Management Limited (Dentons)

SIPP Master Trust

Dentons operates its SIPP under a 'Master Trust' arrangement with each individual SIPP established under a separate individual Sub-trust and each SIPP holder being

appointed as a co-trustee of the Sub-trust. This means that the client's SIPP fund and assets are ring-fenced from other Dentons SIPPs and from Dentons itself.

The assets bought by the SIPP are legally owned by the trustees.

Financial strength

Capital adequacy

Dentons has grown to manage over 6,500 SIPPs and over 800 SSASs with in excess of £5.0bn of assets under administration.

Dentons' capital resources position is such that it has consistently held reserves higher than that required by the FCA. Dentons holds 248% of its capital adequacy requirement.

The capital adequacy rules introduced by the FCA came into effect from September 2016 and are accommodated within our current structure due to our financial resources and track record of profitability. We have controlled exposure to various non-standard assets resulting from our robust due diligence processes.

In force business levels as at 1 July 2020

Key Dentons statistics	SIPP	SSAS
Number of plans under administration	6,506	804
Average case size	£588,769	£1,554,409
Total assets under administration	£3.831 billion	£1.249 billion

Number of properties in our SIPP pension schemes: 1,998

20% of Dentons SIPPs hold non-standard assets.

"A big thank you for helping me get my SIPP set up with Dentons. Very professional and efficient staff who have helped me at every step."

B Bhandal, Gloucester

Dentons' service proposition

Dentons has a clear focus on the delivery of a personalised and expert SIPP administration service to their clients. The servicing proposition is led by the Pension Consultants, two of whom are members of the Dentons' board.

Dentons' Pension Consultants each head up a pension administrator team. Each team deals with a set amount of Dentons' client pension portfolios and provides a single point of contact for all client SIPP transactions.

Dentons servicing structure and training programme are designed to ensure that Dentons' Pension Administrators are comfortable answering any adviser and client queries across every aspect of SIPP servicing.

All members of staff attend regular company training sessions and Dentons encourages and supports staff to take financial exams.

Dentons culture

We pride ourselves on looking after all members of staff. We work in a friendly and respectful office with a high level of teamwork across all departments in the company.

Dentons continually strives to reduce its carbon footprint by evolving into a paperless company, recycling and switching off electrical equipment at the end of the working day.

Sales and Marketing

The Sales and Marketing team provide ongoing services to financial advisers and introducers through regular webinars and seminars, educational workshops and newsletters, as well as pre-sales support, asset acceptance, literature and illustrations.

We support financial advisers in developing professional connections through our frequent webinars and seminars held throughout the UK, often with financial network companies, investment managers, solicitors and accountants.

Online servicing

Dentons offers enhanced secure online functionality to advisers and clients with access to the most up-to-date valuations of their SIPP portfolios, cash balances, contribution and transfer history, and retirement benefits in payment, along with the facility to download recent documents such as bank statements.

Advisers can also access an aggregated view of their Dentons' SIPP client list.

Dentons offers the provision of live data sharing links to certain platform providers (fund supermarkets and wraps) and discretionary fund managers (DFM) and will continue to develop these data sharing relationships.

Online SIPP application

Dentons also provides an online application form for completion on our website. The form will pre-populate repeated fields and lead the adviser and/or client through the relevant sections of the application, missing those that do not apply.

At the end of each section, details can be saved enabling them to be reviewed at a later date and the process continued.

Overview of our services

In addition to providing clients with the greatest asset choice and flexibility through our SIPP, Dentons also offers a full range of specialist pension services with a variety of features to satisfy the most discerning clients, including technical guidance and information.

As part of our service, introducers can request that one of our experts join your initial client meeting.

Dentons is authorised to provide restricted advice relating to regulated financial products.

We can help clients to investigate unique investment propositions and will check that they comply with current HMRC and FCA requirements.

Retirement options

When it is time to draw from their pension, we make sure clients are in full control.

We offer a range of flexible retirement options for when clients choose to take their benefits:

- > flexi-access drawdown
- > uncrystallised funds pension lump sum (UFPLS)
- > capped drawdown (for clients already in capped drawdown)
- > phased retirement.

These are the only choices available with the Dentons SIPP but there are other retirement options available. For more information we recommend clients contact their Financial Adviser.

Key personnel at Dentons

Key personnel

Dentons' staff offer advisers and introducers a wealth of SIPP technical expertise, experience and knowledge.

Key personnel are professionally qualified with most senior staff having a long track record with Dentons, meaning we retain skills, experience and industry knowledge.

Dentons' Directors have a 'hands-on' approach in terms of the day-to-day operation of the business and the core discipline of SIPP servicing.

All Pension Consultants are encouraged to develop professional relationships with introducing firms and to gain an in-depth understanding of their requirements. During working hours they are always available to respond to and seek solutions to, issues, problems and queries that introducers might have.

Administration teams

Dentons achieves the highest standards of service through efficient administration processes.

Our Pension Consultants are supported by experienced Pension Administrators to look after all aspects of a client's retirement provision. All work is undertaken by a specific team rather than a departmental approach, offering bespoke individual administration services and support.

Sales and Marketing

Dentons has grown its sales and marketing function, along with its industry profile in order to support the SIPP proposition and contribute to the development of adviser relationships.

Sales and marketing support is provided by:

- > Director of Sales and Marketing: David Fox
- > Technical Sales Director: Stephen McPhillips
- > Regional Sales Director, North: James Beal
- > Regional Sales Manager, South East: Hannah Berns
- > Regional Sales Manager, Midlands: Oliver Bowler
- > Regional Sales Manager, Scotland: Kyle Dale
- > Marketing Manager: Helen Webb
- > Marketing Assistant: Andy Powell
- > Support staff: Daniel Brooks and Gemma Fearnough
- > Technical Manager: Keith Gorbutt.

All members of the team work closely together and speak with advisers on a regular basis.

Key personnel at Dentons (continued)

Directors	Background and experience	
Derrick Fowler Executive Director	<ul style="list-style-type: none"> > Joined Dentons in 1983 > Appointed to Dentons board in 2005 > Over 25 years' SIPP and 37 years' SSAS experience > Associate of the Institute and Faculty of Actuaries 	Joint Managing Director & Senior Pension Consultant
Ian Stewart Executive Director	<ul style="list-style-type: none"> > Joined Dentons in 1994 > Appointed to Dentons board in 2005 > Over 25 years' SIPP and 32 years' SSAS experience > Holds LLB (Hons)/DipPFS 	Joint Managing Director & Senior Pension Consultant
David Fox	<ul style="list-style-type: none"> > Joined Dentons in 2011 > 26 years' experience in developing adviser relationships > Specialised in SIPPs for past 16 years > Holds FPC and CII G60 pensions qualification 	Director of Sales & Marketing
Senior Staff	Background and experience	
Stephen McPhillips	<ul style="list-style-type: none"> > Joined Dentons in 2012 > 32 years' experience field based consultant > Elected Fellow of PMI in March 2018 	Technical Sales Director
Consultants	Background and experience	
Barry Bolland	<ul style="list-style-type: none"> > Joined Dentons in 2016 > 37 years' experience in pensions industry > Holds BA (Special Hons) 	Pension Consultant
Katherine Cheeseman	<ul style="list-style-type: none"> > Joined Dentons in 2017 > 18 years' experience in the financial services industry > Holds Diploma in Regulated Financial Planning 	Pension Consultant
Rod Doy	<ul style="list-style-type: none"> > Joined Dentons in 1997 > 32 years' experience in pensions industry > Holds Diploma in Financial Planning 	Senior Pension Consultant
Martin Friel	<ul style="list-style-type: none"> > Joined Dentons in 2012 > 30 years' experience in the pensions industry > Holds Diploma in Regulated Financial Planning 	Senior Pension Consultant
Marc Hobden	<ul style="list-style-type: none"> > Joined Dentons in 2014 > 12 years' pension experience > Holds Diploma in Regulated Financial Planning 	Pension Consultant
David Holloway	<ul style="list-style-type: none"> > Joined Dentons in 2013 > 18 years' pension experience > Holds Diploma in Regulated Financial Planning 	Pension Consultant
Paul Johnson	<ul style="list-style-type: none"> > Joined Dentons in 1987 > Over 42 years' experience in pensions industry > Qualified Chartered Insurance Practitioner > Holds Diploma in Financial Planning 	Senior Pension Consultant
Richard Mann	<ul style="list-style-type: none"> > Joined Dentons in 2015 > 28 years' experience in the financial services industry > Holds Diploma in Financial Planning 	Senior Pension Consultant
David Raw	<ul style="list-style-type: none"> > Joined Dentons in 2015 > 18 years' pension experience > Holds Diploma in Regulated Financial Planning 	Pension Consultant

Permitted investment list

Dentons has 40 years' experience within the industry and our Pension Consultants average over 25 years' experience in financial services, dealing with simple and complex investments, including property purchase. A principal feature of our SIPP is the flexibility it provides when it comes to investment options.

Please note: a minimum fund value of £50,000 is required.

Our extensive range of available SIPP investment opportunities:

Funds and equities

- > Equities quoted on the UK Stock Exchange including securities on the Alternative Investment Market (AIM)
- > Equities traded on a recognised overseas stock exchange
- > Insurance company managed funds and unit linked funds through pre-approved investment managers
- > Investment trusts
- > Regulated Open Ended Investment Companies (OEICs) and Unit Trusts
- > Corporate bonds quoted on a recognised Stock Exchange
- > FCA recognised offshore funds
- > Trustee investment bonds
- > Hedge funds
- > UK unquoted equities (subject to individual consideration)
- > Unregulated Collective Investment Schemes (UCIS) (subject to individual consideration).

Deposit accounts

- > Deposit accounts with any authorised financial institution.

Commercial Property

- > Commercial UK property or land
- > Complex property transactions including joint property with other pension vehicles, members or companies.

Other

- > Commercial loans to unconnected parties (other than individuals and partnerships)
- > Trustee borrowing on commercial terms
- > Investment grade gold bullion
- > Intellectual property
- > Residential property through a qualifying collective investment vehicle.

All alternative investments can be considered - however complex - subject to them complying with HMRC and FCA rules. We will investigate each individual asset or investment to ensure that it will not be subject to tax charges.

We will not restrict members in the use of any authorised investment manager or investment platform.

We have a number of established relationships with investment platforms and discretionary fund managers allowing for a full and open architecture offering.

Should a client express an interest to open an account with a fund manager or platform where we have not previously carried out any due diligence, we will carry out the relevant due diligence and on its satisfactory inclusion to our permitted platform list, we will then open the account.

Dentons does not allow the following investments:

- > Residential property
- > Overseas unquoted equities
- > Overseas commercial property
- > Off-plan hotel developments
- > Carbon credits
- > Cloud lending
- > Commodities
- > Land banking
- > Litigation funding
- > Storage pods
- > Individual CFD and FX accounts
- > Futures, warrants, options and binary options
- > Cryptocurrency
- > Any taxable moveable property.

Permitted investment list

Dentons has specialised in commercial property acquisition and management within self invested pensions since its inception over 40 years ago and has considerable experience of dealing with complex investments and transactions. This includes joint property purchases in the UK.

Specific features of property purchase with Dentons:

- > Joint transactions with other providers and/or individuals
- > Full property investment flexibility
- > Flexibility for your client to choose their own solicitor, valuer and lender
- > No compulsory property management agent
- > VAT registration, where applicable.

Examples of properties purchased by a Dentons SIPP:

- > Industrial units
- > Offices and shops
- > Farmland and forestry
- > Public houses
- > Nursing homes
- > Hotels
- > Marine berths
- > Airports
- > Gymnasiums.

Compliance structure

Compliance mission statement

Our experienced compliance team with their sector skills and knowledge, as well as regulatory experience, helps Dentons to achieve and maintain compliance within the FCA's regulations.

We combine expertise in risk analysis with a commercial perspective to build a safe business environment.

Our aim is to:

- operate in a compliant manner at all times
- promote greater understanding of the benefits of best compliance with the FCA rules and regulations
- establish and maintain a 'pro-compliance' culture
- maintain high professional standards and ongoing competence including ethical behaviour through education, training and continuing professional development
- encourage all business to be conducted with integrity, diligence and professionalism.

Key compliance personnel

The Compliance Officer is Derrick Fowler who is supported by the Compliance Manager, Rod Priest, who joined Dentons in 2015 and is a Fellow of the Personal Finance Society (PFS). In addition, Dentons uses the services of an external Compliance Consultant, Alan MacArthur, who has worked closely with Dentons since 2001.

Asset acceptance

The senior management of Dentons has initiated an Investment Committee as a way of monitoring and controlling non-standard and sophisticated investments. The Committee conducts an internal investigation as well as using the services of an external party - *in:review* to carry out third party due diligence and provide investment reports.

This due diligence forms the basis of Dentons' decision-making process for approving or declining such investments as suitable to be held within the SIPP.

The Committee continually reviews its practices in light of increasingly sophisticated investments and regulatory good practice.

The Committee is made up from members of senior management, compliance and technical.

Keith Gorbutt, Technical Manager, can also assist with technical issues and due diligence over 'non-standard' assets.

Keith has worked in financial services since 1996 and has over 20 years' experience in the SIPP industry, joining Dentons in 2012.

Complaints

Complaints are dealt with in accordance with our Complaints Procedure, a copy of which is available on request. Complaints should be addressed to the Compliance Officer at Dentons.

Quality of systems and controls

Treating customers fairly

The Dentons' Board of Directors has long regarded Treating Customers Fairly (TCF) as a priority and every effort is made to cascade this down through line management and consultants to every member of staff. This ensures that everyone within the company understands and implements the fundamental requirements of the FCA's TCF rules and its application to the operation of Dentons' pension arrangements.

Consultants and administrative staff are encouraged at regular meetings to ensure they have satisfied the principles of TCF at all times.

Continual monitoring

Dentons has an experienced review team who continually monitor client documentation, illustrations, disclosure and procedures to ensure their accuracy and technical validity.

All product literature is independently reviewed to ensure clarity and accuracy of content without the use of 'jargon'.

Data protection

All data held is subject to the provisions and requirements of the General Data Protection Regulation (GDPR) as determined by the Information Commissioner with whom we are registered as the Data Controller. Dentons fully complies with GDPR which outlines how personal data will be handled and securely stored.

Business continuity plan

In the event of a catastrophic failure to the existing premises or systems, and to ensure business can continue, arrangements have been made for Dentons to operate from alternative nearby facilities.

Prevention of fraud

For Dentons, the underlying key to the prevention of fraud is that the SIPP holder must be a joint signatory to any payment made from their account. Internally, only senior staff are authorised to sign documents relating to asset ownership and reconciliations are undertaken regularly to minimise any fraud risk within the organisation. Reconciliation of SIPP bank accounts occurs monthly.

Dentons is unable to remove client funds upon its own authority.

Anti-money laundering

Dentons follows industry guidelines for anti-money laundering processes, as set out by the Joint Money Laundering Steering Group.

Dentons also works with introducers to ensure that the identity of clients is correctly confirmed.

Award winning SIPP specialist

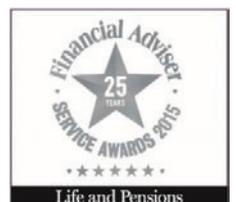
Winning externally accredited awards is a testament to our dedicated, knowledgeable and experienced Pension Consultants and administrative staff and to our range of self invested pension products.

Our level of client services and pension products continue to lead the way, backed by impressive customer assessment.

'5 star' Financial Adviser Service Awards 2012, 2013, 2015, 2016, 2017, 2018 and 2019

For seven years Dentons has been recognised for its service by receiving the 5 star award from Financial Adviser, as voted for by IFAs. For 2013 and 2015, we were also awarded top performer in the Life & Pensions category of these awards. We were not eligible for an award in 2014.

This is an endorsement of our continuous focus on delivering exceptional service and flexibility, and reacting to changes in the marketplace to make it easier for advisers to do business.



Dentons' default SIPP bank account

Whenever a SIPP is established with Dentons, a default sterling SIPP bank account is opened.

The default sterling bank account for the Dentons SIPP is provided by Cater Allen.

Clients are able to open additional deposit accounts with bank(s) of their choice.

The default sterling account is not intended as an investment account but for the facilitation of transactions.

Rates of interest

The following rates are effective from 29 June 2020.

SIPP Deposit Amount	Gross % Interest Rate Payable
Up to £99,999	0.01%
From £100,000 to £499,999	0.05%
From £500,000	0.1%

Headline SIPP Fees

Establishment	£350	<ul style="list-style-type: none"> > Setting up the default bank account > Checking application details > Anti-money laundering verification > Processing of initial contributions > Reclamation of tax on contributions
Standard administration - full assets	£570 per annum	<ul style="list-style-type: none"> > Preparation of the reconciled annual statement > Regular reconciliations during the year > Fulfilling regulatory requirements > Reclamation of tax on subsequent contributions
Standard administration - single investment*	£420 per annum	<ul style="list-style-type: none"> > A lower Standard administration fee will apply where only a single investment manager or platform is chosen for a minimum of 12 months from establishment of the SIPP and is pre-accepted by Dentons.
Setting up default bank account	£NIL	<ul style="list-style-type: none"> > Covered within our Establishment fee
Cash transfer In	£50	<ul style="list-style-type: none"> > Per transfer
Defined benefit transfer In	£250	<ul style="list-style-type: none"> > Per transfer

*If clients upgrade their plan from the single investment Standard administration fee to the full assets Standard administration fee to accommodate additional investments, they will not be able to move back to the lower Standard administration fee at any time.

Payment of fees

- > Establishment fee is deducted once the SIPP is set up**
- > Standard administration fees are normally deducted 6 months in arrears
- > All other fees are normally invoiced 6 monthly in arrears
- > Dentons' standard fees can be paid personally rather than having them deducted from the default bank account
- > All fees are subject to VAT.

Financial adviser remuneration

Dentons' SIPP product is RDR compliant and the principles of adviser charging enable Dentons to pay the remuneration agreed between the client and the adviser.

For a full list of Dentons' current fees, please refer to our SIPP Fee Schedule.

**Please note: If you are a direct client we will require a cheque for £420 (inclusive of VAT) to cover the Establishment fee when you submit your SIPP application form. Cheques should be made payable to 'Dentons Pension Management Limited'.



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Dentons Pension Management Limited, Denton & Co Trustees Limited, NTS Trustees Limited, TP Trustees Limited and Sippchoice Trustees Limited are registered in England & Wales under numbers 02352951, 01939029, 01407848, 02604059 and 06869793 respectively. Registered office at Sutton House, Weyside Park, Catteshall Lane, Godalming, Surrey, GU7 1XE.

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VAT number for Dentons Pension Management Limited is 863 1639 14.