J. PIETRUSZKA
Principal
105 VICTORIA ROAD
SWINDON SN1 3BD
Tel: 0044 1793 611126
Fax: 0044 1793 610604
Mobile: 07775 782003
www.jan-cash.co.uk
e-mail:mail@jan-cash.co.uk

JAN INVESTMENT MARKETING

SSAS Review Report

Prepared for:

Edward Bailey

TGS Retirement Scheme

Prepared by:

Jan Pietruszka

JAN Investment Marketing

13/01/2020

JAN
INVESTMENT MARKETING

SSAS REVIEW REPORT

Scope of this review

This report is an overview of the TGS Retirement Scheme and has been undertaken by JAN Investment Marketing who has been appointed as pension consultant by the member trustees of this small self-administered scheme (SSAS). The scope of this review is limited to an overview only. JAN Investment Marketing makes no recommendation as to the appropriateness of the SSAS pension scheme nor its investment strategies undertaken.

It is the responsibility of the Trustees of the TGS Retirement Scheme to carry out due diligence on all the companies and stakeholders they have been entrusted to invest and manage the TGS Retirement Scheme on their behalf. We have listed these in this report.

You should not use any part of this report as advice or suitability or recommendation and we do not accept any liability for the administration of the TGS Retirement Scheme by the trustees nor any advice given to you from any 3rd party directly or indirectly including the management or operation of the scheme. We will not offer any tax advice other than telling you that tax levels, and reliefs are subject to change in line with HMRC.

Introduction and Basis of the Review.

In preparing this review provided by Carlton James we have taken into account the TGS Retirement Scheme prospective membership profile and data. Having considered the membership profile and the best practice guidelines the review findings are detailed within this report. We have been commissioned to conduct this review on all areas addressed in this report. I would ask that you read the report carefully and check that it reflects the TGS Retirement Scheme members intended investment strategies, priorities and outcomes.

It is important that you understand this review. You should read this report in conjunction with the remuneration disclosure and the Fund fact sheets and Information Memorandums you have been supplied with, which all provide important information about the TGS Retirement Scheme investments reviewed within this report. I do stress that if you do not understand any of the information contained within this report then please contact me.

TGS Retirement Scheme and its Trustees have also been provided with a copy of our Client Agreement.

Date of Client Agreement	Date of Identity Verification	Date of First Meeting	Date of Last Meeting	Initial Engagement Fee	Ongoing Reviews Annual Charge
13/01/2020	07/10/2019	21/06/2019	13/01/2020	1% of Fund	0.5% of Fund

If you believe that the information in any of the documents provided is incorrect please let us know. We would also mention that if any information has not been disclosed, it is possible that our review may not take account of the TGS Retirement Scheme members requirements and could ultimately have been different. We cannot accept responsibility for any non-disclosed information which could have affected this review. Nor can I accept any liability should you suffer any loss due to the non-disclosure of material facts which have not been brought to our attention.

Summary of Current Position & Objectives

TGS Retirement Scheme - 1 member pension arrangement

The scheme is a Small Self Administered Scheme (SSAS) style pension which is an arrangement which forms all or part of a personal pension scheme, which gives the member the power to direct specifically how some or all of the member's contributions are invested (as opposed to simply choosing a fund or funds).

All the members of the TGS Retirement Scheme are also Trustees of the scheme. As such the members manage the administration and investment of the scheme themselves, often with the help of a professional trustee or administrator responsible for the everyday operation of the scheme. A Trustee is company appointed to hold assets for the beneficiaries of a trust-based pension scheme, in accordance with the provisions of the trust instrument (the legal document that sets up, governs or amends the SSAS scheme) and general provisions of trust law.

A feature of all SSAS style schemes is that they offer a range of investment options, and the value of each member's savings changes in line with the funds they are invested in. Many people are understandably reluctant to select their own investment strategy, and so it is important that the TGS Retirement Scheme investment strategy and asset allocation is suitable for all the scheme members with equal and fair member outcomes. As such there should be an appropriate balance between risk and return for the membership profile and the charging structure should reflect this balance. The investment strategy and asset allocation should take into account, on reasonable grounds, the retirement profile of members.

Please find below a summary of the current TGS Retirement Scheme member trustee and individual fund value with Investment allocation:

Member Name	Member Age	Selected Retirement age	Pension Value	MIX3 Ltd	HJ Collection Ltd	Cash
Edward Bailey	54	60	£319,148	£111,000	£111,000	£97,148

We have used the following information to get a broad sense of the scheme membership profile:

Scheme membership profile	
Average member earnings	£100,000
Proportion of males	Equal to 100%
Proportion of females	Equal to 0%
Business in financial sector?	No
Retirement age	60
Preferred equity	External passive management

Based on the inputs provided, shown above, the scheme membership profile suggests an overall risk level of balanced. We have been advised by Carlton James Private & Commercial Ltd that the most appropriate risk level for TGS Retirement Scheme should be moderately adventurous.

Moderately Adventurous investors typically have moderate to high levels of investment knowledge and will usually keep up to date on investment issues. They will usually be fairly experienced investors, who have used a range of investment products in the past.

In general, moderately adventurous investors are willing to take investment risk and understand that it is crucial in terms of generating long-term return. They are willing to take risk with a substantial proportion of their available assets.

Moderately Adventurous investors will usually be able to make up their minds on investment matters quite quickly. While they can suffer from regret when their investment decisions turn out badly, they are usually able to accept that occasional poor outcomes are a necessary part of long-term investment.

We have undertaken a review of the TGS Retirement Scheme investment selections and have undertaken this review on the basis of the information you have provided.

Based on the information supplied the company Asset Portfolio Ltd has established a Small Self Administered Scheme (SSAS) for the following reasons:

- A SSAS will allow the Company and the scheme member trustees to exercise substantial control over the choice of investments held under the Company pension scheme. Whilst the Company may not use all of the options available, the TGS Retirement Scheme intends to invest in a broad spectrum of investments and require the flexibility to change underlying investments in the future without having to switch providers
- The range of permitted investments is much greater under a SSAS than other pension arrangements and the Company pension scheme and its members are comfortable paying higher charges to gain access to a broader and more sophisticated range of investment opportunities
- Benefits can be taken by individual members at any time from age 55 and the effective requirement to buy an annuity at age 75 was scrapped from 6th April 2011
- 25% of the uncrystallised pension fund can be taken as a Pension Commencement Lump Sum (tax free cash) payment by any member from the age of 55
- There will be no death benefit tax charge on an individual scheme members uncrystallised pension fund on death before age 75 assuming the total value of the pension benefits are within the individual members lifetime allowance. This will help ensure that individual pension scheme members beneficiaries are looked after, financially and in a tax efficient manner, upon death
- Members will receive tax relief on all personal contributions

There are a number of factors to be considered when undertaking a review.

Investment Options and Performance

There is obviously no means to categorically predict future investment performance. Although it should be stressed that past performance is no guarantee of future performance, it can act as a useful guide. It is also beneficial to compare the range of investment options available. Flexibility to switch between a wide range of strong performing investment opportunities is important. Your scheme membership attitude to risk could change, and as a result you may wish to take an alternative investment strategy in the future.

Charging Structure

The effect of charges is reflected in the Reduction in Yield of the selected investments. The Reduction in Yield, discussed in this review letter, includes deductions for expenses, consultancy remuneration and other adjustments. For further information concerning charges, I refer you to the Fund fact sheets and Information Memorandums you have been supplied with.

Financial Strength

A pension is a long term investment. As such, it is imperative to select a provider who is financially secure and will be able to meet all their obligations to policyholders in the future.

Summary of the TGS Retirement Scheme review

Ownership	Pension	Company	Member Trustee Number	Pension Value	Chosen Retirement Age
TGS Retirement Scheme	SSAS	Touchestone Geological Services Limited	1	£319,148	60

Employer contributions will usually qualify as a business expense which can be offset against taxable profits.

Pension Practitioner – Small Self Administered Scheme administrator

As the registered SSAS administrator Pension Practitioner will monitor the list of investments undertaken during the scheme year, will review payments in and out of the scheme and prepare a financial return. They may also prepare other returns depending on the transactions undertaken. They will send this to all member trustees for agreement and it will be submitted to HM Revenue & Customs. During the scheme year, matters arise which investment providers will require assistance on from the scheme administrator, Pension Practitioner will provide them with that information necessary for the pension scheme to conform to certain tax regulations. They will communicate with trustees throughout and also provide members with an end of year report, benefit statements and invitation to renew administration services with them. They will also undertake compliance returns to the Regulator and other bodies to ensure conformity.

Investment Strategy

We have reviewed your investment strategy and asset allocation of the available monies to be invested as follows:

Fund	Description	Objective	Sector	Risk Rating	Initial Charge	Annual Management Charge	Amount Invested	Scheme Allocation
MIX3 Ltd	Secured Loan Note	Growth of investment over the 18 month term	Financial Instrument	Adventurous	0%	0%	£111,000	34.7%
HJ Collection Ltd	Secured Loan No	Growth of investment over the 24 month term	Financial Instrument	Adventurous	0%	0%	£111,000	34.7%
Cash	Cash	SSAS charges IFA Charges Member - Benefits	Cash	Very Cautious	0%	0%	£97,148	30.4%

MIX3 Ltd – 18 month Loan Note Fixed Return

Investment Type	Invested Amount	Minimum Investment Term	Annual Returns	Frequency of Returns	Early Exit Terms	Early Exit Penalties	Capital Returned at Maturity
Asset Backed, first charge loan note instrument	£111,000	18 month Fixed Rate Secured Loan Note	1% monthly for a fixed duration of 18 months	At the end of the 18 month term	Non Offered	N/A	118%

MIX3 Ltd was incorporated as a special purpose vehicle, to acquire commercial properties for development into residential real estate, new build and planning gain opportunities, hotel & leisure class real estate by the Developer, Magna Asset Management Limited. Magna Investments X 3 Ltd will seek to raise four million pounds for the 18 month raise, via the mechanism of a Loan Note Instrument, for acquisition and development costs together with professional fees, planning permission and preparatory costs and any other associated fees and expenses. Once converted, the properties would become a commercial asset that, in order to redeem the principle and interest the Loan Notes intend to be repaid by one of the following methods.

(NB Magna have no fixed preference as to how the redemption will be made and is solely their discretion for this matter):

a) by means of refinance,

b) by the sale and/or disposal of one of the invested assets and/or an asset that falls within the Magna Group of companies or under the ownership of any one or more of the Directors of Magna,

c) by way of Initial Public Offering or secondary equity listing on the public markets on any major stock market.

This Loan Note Instrument is governed by the laws of the United Kingdom. The Company strategy is to take full advantage of current market conditions and acquire assets through the following methods:

- Acquire commercial properties for development into residential real estate, new build, planning gain opportunities hotel class real estate. The investments are not limited to the UK.
- The funds will be used to acquire land & or develop the property into residential or hotel accommodation.
- The properties will be renovated using permitted development rights where possible, or the equivalent full planning requirements.

The structure and flow of this investment is as follows;

- The investor purchases Loan Notes issued by MIX3 Ltd
- Minimum Investment £20,000, each Individual loan note value £1,000

- MIX3 Ltd use the investor funds to purchase and to cover renovation and management costs associated with acquiring commercial properties
- All investor funds are held by an appointed Independent Security Trustee in a Special Purpose Vehicle (SPV)
- MIX3 Ltd utilise the funds to for acquisition and development costs
- Magna Asset Management Limited will produce a business plan in respect of each property acquisition and development project.
- The investment is secured by way of the Share Charges held by the Security Trustee over the shares of Oliver Mason and Christopher Madelin in Magna Asset Management Ltd and fixed and floating charge over MIX3 Ltd and subsidiary interests.
- Anticipated returns into the company is expected to be derived from sales of the leasehold apartments which the Company develops and in the case of retained assets the earnings before interest, tax, depreciation and amortisation of the SPV and its asset after all gross costs are deducted
- At the maturity of the investment term (18 months) the investor will recapture the original investment plus all returns due.

Capital Requirements

- 18 month Investment term with principle and interest payable at maturity (18^{th} month).
- Returns fixed at 1% per calendar month for 18 months.
- Investment made in sterling and all returns are in sterling
- The Loan Notes are non-assignable and non-transferrable and may be redeemed no earlier than the Redemption date.
- All costs, both legal and administrative, associated with the loan note instrument and execution of the share charge is borne by MIX3 Ltd.
- The investor will recapture the principle capital plus interest after 18 months
- The Loan Notes will be repaid along with their coupon payment of 18% in one lump sum at the end of the 18 months

Risk Profile: Investors should be adventurous risk, seeking to achieve fixed returns generated from this asset backed loan note instrument investment. Specific risks with this type of unregulated investment scheme (UIS) are detailed in the appendix and include but are not limited to changes in government policy, i.e. removal of permitted development rights, a major fall in property prices making sales or refinance difficult. Investors should be able to commit money to this investment for a minimum of 18 months. This investment is non FCA regulated and has no recourse to Financial Services Compensation Scheme. Individual investors should consider carefully whether this investment is suitable for them in light of personal circumstances and financial resources available to them. Past performance is not necessarily a reliable indication of future performance.

The return on investment is personal to each investor. Investors are responsible for taking the necessary tax advice related to their interest payments. Full information can be referenced from the factsheet along with Due Diligence pack already provided to all member trustees.

HJ Collection Limited – 2-year Fixed Rate Capital Growth Loan Note

Investment Type	Invested Amount	Minimum Investment Term	Annual Returns	Frequency of Returns	Early Exit Terms	Early Exit Penalties	Capital Returned at Maturity
Asset Backed first charge loan note instrument	£111,000	2 Year Fixed Rate Secured Loan Note*	Year 1-10% Year 2-10% 4% Bonus at maturity	At Maturity -at end of Year 2*	Non Offered (repayable on Death at the company's discretion)	N/A	124%

*The Company will have the option to defer redemption of Loan Notes on maturity for up to an additional six months. Interest will be payable at 10% per annum, prorated to the date of redemption.

HJ Collection Limited was established in February 2019, to acquire commercial properties for development into residential accommodation to let on a fully managed basis. The Directors have established separate limited companies which will undertake the development of the properties acquired by the Company. HJ Collection Limited will seek to raise 12 million pounds of investment funds via the mechanism of a Loan Note Instrument, to acquire suitable commercial properties, and strategically renovate and manage these assets to achieve the fixed returns. Once converted, the properties would become a commercial asset, whose underlying value whilst linked would not be reliant on the variable housing market price index. The investment opportunity utilises the asset class of commercial office buildings and the borrowing is secured by a First Legal Charge. Loan Note Instruments are the legal method used to raise investor finance which detail the sum invested the interest payable and the agreed term of the Loan. This Loan Note Instrument is governed by the laws of the United Kingdom. The Company strategy is to take full advantage of current market conditions and acquire assets through the following methods:

- Initially acquire commercial properties in prominent towns or Cities
- The funds will be used to acquire & develop the property into residential accommodation.
- The properties will be renovated using permitted development rights where possible, or the equivalent full planning requirements.
- The Company will then liaise with known private, and council letting contacts, to speedily let and manage rooms.

The structure and flow of this investment is as follows;

- The investor purchases Loan Notes issued by HJ Collection Limited
- Minimum Investment £10,000, each Individual loan note value £1,000
- HJ Collection Limited use the investor funds to purchase and to cover renovation and management costs associated with acquiring commercial properties
- All investor funds are held by an appointed Independent Security Trustee in a Special Purpose Vehicle (SPV) specifically established to manage every commercial property project.
- The properties selected must adhere to specific criteria, key ones being the purchase price of the property and the cost of renovation. Each room is given an average cost to complete, which takes into account all aspects of the renovation, project management, administration, licensing, and liaison with councils.

- The investment is secured with a first legal charge by the Security Trustee on the asset which is commercial properties.
- Loans for Property backed developments are generally being developed in order to retain as an investment but are sometimes sold.
- At the maturity of the investment term (2years) the investor will recapture the original investment plus all returns due. The Company does have the option to defer redemption of Loan Notes on maturity for up to an additional six months with interest payable at 10% per annum, prorated to the date of redemption.
- The exit routes to redeem Secured Loan Notes consist of the following methods:
    - Income from letting the developed units
    - Retention of the developed properties and further financing obtained by the company
    - Sale of the developed properties to landlords
    - Purchase of the developed properties by landlords
    - Sale of the developed properties on the open market

Capital Requirements

- Investment term option of 2 years selected with all returns payable at maturity
- Returns fixed at 10% year 1, 10% year 2 plus 4% bonus at the end of year 2.
- Investment made in sterling and all returns are in sterling
- All costs, both legal and administrative, associated with the loan note instrument and execution of the first legal charge is borne by HJ Collection Limited.
- The investor will recapture the original investment after 2 years

Risk Profile: Investors should be adventurous risk, seeking to achieve fixed returns generated from this asset backed loan note instrument investment. Specific risks with this type of unregulated investment scheme (UIS) are detailed in the appendix and include but are not limited to changes in government policy, i.e. removal of permitted development rights, a major fall in property prices making sales or refinance difficult. Investors should be able to commit money to this investment for a minimum of two & a half years. The loan notes are non-transferable and an illiquid investment. This investment is non FCA regulated and has no recourse to Financial Services Compensation Scheme. Individual investors should consider carefully whether this investment is suitable for them in light of personal circumstances and financial resources available to them. Past performance is not necessarily a reliable indication of future performance.

The return on investment is personal to each investor. Investors are responsible for taking the necessary tax advice related to their interest payments. Full information can be referenced from the factsheet along with Due Diligence pack already provided to all member trustees.

Reviews

Requirements in Retirement

It is important that you review your pension provision with your pension adviser on a regular basis as your current level of funding may prove insufficient to meet your required income requirements in retirement. You should also remember that if you elect to take part of your pension fund as a tax free cash payment, this will reduce the income you receive from the residual pension fund.

Nomination of Beneficiary

We would suggest that you complete a Nomination of Beneficiary Form. This will ensure the proceeds of your pension, subject to the trustee's discretion, are paid to your chosen beneficiary on your death.

For further information regarding the level of contributions that can be made to, how benefits can be taken from, and the taxation of pension arrangements we refer you to consult your pension adviser and the Technical Notes in the appendix of this report. A summary of the risk warnings associated with this review report can also be found in the appendix of this report.

Important Information

Cost of Services

There are various ways we can be remunerated for our advice and the provision of our services. A summary of the options can be found in our Tariff of Charges document, Services and Costs Disclosure Document (SCDD) or Combined Initial Disclosure Document (CIDD) provided.

A detailed summary of all the charges associated with the advice provided in this report can be found below:

Charges Summary

Small Self Administered Scheme Charges for the TGS Retirement Scheme.

Entry Charges			Ongoing Annual Charges			Exit Charges
Appointed Pension Consultant Fee	Appointed Pension Consultant Fee Paid By	Practitioner Setup Fee	Practitioner Administration Fee	Appointed Pension Consultant Fee	Consultant Fee Paid By	Practitioner Member Exit Charge
1% of fund	SSAS Cash Account	£960	£880	0.5% of fund	SSAS Cash Account	£750

Entry Charges: One off charges taken before or on investment.

- Appointed Pension Consultant Fee: A fee paid to the Consultant for the review service.

- Consultant Fee: Paid By Cash Account: The Consultant Fee will be paid from the cash account within your Small Self Administered Scheme.

- Practitioner Fee: Fees agreed with the Pension Practitioner (The SSAS Scheme Provider and Administrator) in relation to Scheme set up, year 1 annual administration charge and member funds transfer in charges.

- Practitioner Fee: Paid By Cash Account: The Practitioner Fee will be paid from the cash account within your Small Self Administered Scheme.

Ongoing Charges: Regular charges, typically taken over a year.

- Appointed Pension Consultant Fee: A fee paid to the Consultant for ongoing review services.

- Consultant Fee: Paid By Cash Account: The Consultant Fee will be paid from the cash account within your Small Self Administered Scheme.

- Pension Practitioner Fee: A fee paid to the Practitioner for ongoing services.

- Practitioner Fee: Paid By Cash Account: The provider Charge will be paid from the cash account within your Small Self Administered Scheme.

Member Exit Charges: One off fees taken on termination.

- Exit Charge: Applicable under the plan following early surrender, encashment or transfer.

Our Service Proposition

- A focused and limited review service undertaken as the appointed consultant to the Trustees.

Financial Services Compensation Scheme ('FSCS')

This scheme does not apply to SSAS Investment or to any of the investment contained herein.

Confirmation

We have only completed a review and summary of the TGS Retirement Scheme within the scope provided to us by Carlton James Private & Commercial Ltd for general information purposes only, without any warranties concerning the accuracy, or the completeness of the content. You should not use any of this report as advice or recommendation regarding the suitability of the scheme.

We have not carried out due diligence on the companies named in this report as this falls outside of our remit. Due Diligence validates the firm's dealing, a firm's directors and officers and determines it's assets and liabilities. It evaluates it's commercial aptitude and that it acts prudently, within the scope of it's permissions in evaluating associated risks in transactions relating to investing and warn you of your responsibility as an investor and to gather necessary information on actual or potential risks involved in an investment. You assume all responsibility and risk with respect to your membership of any SSAS scheme.

We hope you agree that the contents of this report correspond to your current needs and future requirements. If you have any queries concerning the content of this report, or should you feel the review report information is in any way an inaccurate reflection of your circumstances and future objectives please contact Carlton James Private & Commercial Ltd immediately.

Report written by

Jan Pietruzska

SSAS Consultant

Signature ____________________ Date 13/01/2020

We, the undersigned have received this report. We acknowledge this is a fair reflection of our conversation and confirm we have received all supporting literature including fund fact sheets and Information Memorandums.

Accepted by TGS Retirement Scheme Trustee: Edward Bailey

Signature ____________________ Date 13/01/2020 Name: Edward Bailey

APPENDIX

APPENDIX

Risk Warnings – Small Self Administered Scheme (SSAS)

In addition to the risks shown below, we recommend you read carefully the section entitled "risk factors" in the Key Features Document provided which highlights any possible disadvantages of affecting this plan.

- For a full explanation of the charges and how they affect your plan, please refer to the personalised illustration Key Features Documentation, Information Memorandums and Fund Fact Sheets supplied by the product provider.
- The figures on any quotations provided are for illustration purposes only and are not guaranteed.
- The cost effectiveness of your SSAS may depend on a number of factors:
    - The size of your SSAS in relation to the initial and ongoing costs.
    - The type of investments held.
    - The frequency with which you deal.
    - The size of transaction you undertake.
- The value of the investment is determined by the value of the investment, the price of which can fall as well as rise. What you get back is not guaranteed. It will depend on investment performance and the cost of converting your pension fund into an income for life.
- If you have a smaller fund or deal excessively, the value of your SSAS may be eroded and the costs may be disproportionate to the value of your SSAS.
- The reviews are based on current taxation, law and practice and the current legal and administrational framework and are based on my current interpretation and understanding of those, all of which may be subject to change.
- Past performance is no guarantee of future returns.
- When you retire, your pension may be lower than illustrated if:
    - You stop or reduce your contributions.
    - Investment performance is lower than illustrated.
    - The cost of converting your pension fund into an income for life is more than illustrated.
    - You start taking your pension earlier than your chosen pension age.
    - Tax rules change.
    - Charges increase above those stated.
- It is important to periodically review the value of your investments against expectations - particularly as you approach your chosen retirement age when it is advisable to transfer some or your entire fund to a more stable investment environment.
- Where a property fund has been selected the value of the fund is based on the valuer's opinion rather than fact. You should be aware property and land can be difficult to sell – so you may not be able to cash-in this investment when you want to. In extreme market conditions the fund manager may have to delay acting on your instructions to sell your investment.
- Where a fund invests in overseas markets, changes in currency exchange rates mean that the value of the investment can go up or down.

Technical Notes – Pensions

A current summary of the main UK registered pension's legislation can be found below.

State Pension Age

The State Pension Age is 65, it is proposed to be further increased to age 66 by 2020, age 67 between 2026 and 2028, age 68 by the mid 2030s and age 69 by the late 2040s

Contributions

There is no restriction on the number of pension schemes one can contribute into.

Individual contributions are unlimited. However, there are limits on the amount of tax relief receivable. This is restricted to the higher of £3,600 or 100% of salary subject to the annual allowance.

The annual allowance for contributions in 2018/19 is £40,000 which if breached; the excess will be subject to a tax charge at the members marginal rates. It is possible however to offset contributions in excess of the annual allowance against unused allowances from the previous three years.

The government has introduced a tapered annual allowance for those who earn in excess of £150,000 p.a. including pension contributions. The allowance is tapered by £1 for every £2 of income that exceeds £150,000. However the allowance cannot fall below £10,000.

The Money Purchase Annual Allowance (MPAA) is £10,000 and this lower allowance is triggered when money purchase pension scheme benefits are accessed flexibly by the member through flexi-access drawdown (although not if just tax free cash is withdrawn), short term annuity, uncrystallised pension fund lump sum or payment of a scheme pension under a money purchase arrangement with less than 12 members. This reduction only applies to money purchase pension schemes. For members subject to the MPAA, an 'alternative annual allowance' of up to £40,000 is retained for defined benefit scheme contributions.

Employer contributions count towards the annual allowance. It is up to the Employer's local inspector of Taxes whether or not the entire contribution will be relievable for tax purposes.

No tax relief will be granted on contributions paid after age 75.

A tax free lump sum recycling limit of £7,500 exists to prevent exploitation of pensions tax relief. It seeks to avoid the payment of the tax free lump sum amount just received back into the plan as a new tax relievable contribution.

Retirement Ages

The normal minimum pension age is 55.
Benefits can be taken earlier if a protected pension age applies or permanent ill health.

Tax-Free Lump Sums

Are generally 25% of the fund values from a registered scheme
It was possible to protect funds in excess of 25% (before April 2006 only)

Death Benefits

Death before age 75 - Any beneficiary can inherit the pension funds and there is no tax charge whether taken as an income or lump sum provided that income is designated, and lump sums are paid, within 2 years.

Death at or after age 75 - Any beneficiary can inherit the pension funds either as an income or a lump sum. Both would be taxable at the beneficiary's marginal rate. (A higher tax rate of 45% applies if the beneficiary is an entity other than an individual.)

Beneficiaries - The term 'any beneficiary' means a 'dependant' (financially dependent) or other 'nominee' (not financially dependent). On the dependant or nominee beneficiary's death, funds can be inherited by a 'successor'. Payment from a dependant's flexi-access drawdown fund will not cause the money purchase annual allowance rules to apply to the dependant.

The Lifetime Allowance

Is the limit of pension benefits that can be drawn before tax is applied. Excess benefits are subject to a tax charge of 25% if income or 55% if taken as a lump sum.

- The lifetime allowance is currently £1 million and from April 2018 the allowance will be indexed annually in line with CPI

Pension Protection

- Enhanced, Primary, Fixed or Individual are forms of pension protection and were introduced between 2006 and 2016 in order to ring fence benefits from the lifetime allowance

Retirement Benefits - Post 5th April 2015

Unrestricted retirement benefits can be taken from a defined contribution or money purchase pension scheme at any time from age 55.

Drawdown Pension – Income can be taken direct from the pension fund as follows:

- *Flexi-Access Drawdown* – Allows any income amount chosen
- *Short Term Annuity* – An amount can be used to buy an income for a term of up to 5 years

Uncrystallised Pension Fund Lump Sum – Allows a single or a series of lump sums to be withdrawn.

Lifetime Annuity – Allows a guaranteed income for life that can increase or decrease.

Scheme Pension – This offers a secure lifetime income payable to the member of the scheme.

Small Pot Lump Sums – Where a pension fund is less than £10,000 (up to a maximum of three pots), the entire fund(s) can be withdrawn as a lump sum (25% tax free rule applies)

Trivial Commutation Lump Sum – Where a Defined Benefit pension is worth £30,000 or less the value can be surrendered as a lump sum (25% of which is tax free).

Serious Ill Health Lump Sum – Whether accessed or not, individuals with less than 12 months to live can withdraw their entire fund tax free up to age 75 or taxed at their marginal rate if aged 75 or over.

Auto-Enrolment

All employers are required by law to automatically enrol certain members of their workforce (known as eligible workers) into a qualifying workplace pension scheme and contribute to it. A minimum contribution is set based on a band of the gross annual earnings and will include the employee's and employer's contribution and the tax relief added together. These duties took effect for the largest employers from 2012 with all other sized employers being phased in until 2018.

Notes on Financial Products

Personal Pension Plan

Personal pensions aim to build up a sum of money in a tax efficient way which can subsequently be used to provide an income or lump sum(s) during retirement.

Modern personal pensions are generally extremely flexible in that they will accept regular, monthly, annual or one off contributions from individuals and from employers and the level of regular contributions can be changed at any time subject to the provider's minimums.

Taxation

Contributions will qualify for tax relief at the individual's highest rate of income tax and are paid net of basic rate tax at 20%. The pension provider collects the basic tax relief from HM Revenue & Customs up to the maximum limits set by them. Any higher or additional rate relief entitlement can be reclaimed through the individual's annual tax return.

Growth in the value of the pension fund is free from capital gains tax and certain types of dividends paid to the plan are free from income tax. Under normal circumstances, no inheritance tax liability will arise from pension death benefits provided a named beneficiary exists at the date of death.

Small Self Administered Scheme (SSAS)

A Small Self Administered Scheme (SSAS) is a special type of personal pension which allows you to have a greater involvement in the running of your pension and offers a much wider choice of where to invest your pension savings.

Individual contributions are unlimited. However there is a limit on the amount of gross contributions that an individual can pay each tax year and receive full tax relief upon. This is restricted to the higher of £3,600 or 100% of salary, subject to an annual allowance of £40,000 for the current tax year. It is possible to offset one-off spikes in contributions in excess of the annual allowance against unused allowances from the previous three years. Employer contributions count towards the annual allowance. Also, it is up to the Employer's local inspector of Taxes whether or not the entire contribution will be relievable for tax purposes. Individuals are subject to a tax charge on the amount of any contribution (both individual and employer) paid in excess of the annual allowance each year. The tax charge will be at the member's marginal rate of tax. No tax relief will be granted on contributions paid after age 75.

A pension is one of the most tax efficient ways of saving for your retirement. Contributions qualify for tax relief at your highest rate of income tax, subject to the restrictions outlined above. Contributions are paid net of basic rate tax and the pension provider collects the tax relief from the HM Revenue & Customs. This means that for every £80 you contribute, £100 will actually be credited to your plan. Any higher rate tax relief to which you are entitled can be reclaimed through your annual Tax Return. Growth in the value of the pension fund is free from capital gains tax and certain types of dividends paid to the plan are free from income tax.

Benefits can usually be taken from age 55, including while you are still working. At that time you can elect to take 25% of the accumulated fund as a Pension Commencement Lump Sum (tax free cash) payment. The remainder of the fund may be used to purchase an annuity, which can be established on a basis to suit your individual circumstances and objectives at that time. Alternatively you can choose to take the benefits directly from your pension fund via a more flexible retirement plan. The effective requirement to buy an annuity by age 75 was removed from 6th April 2011.

On death before age 75, there will be no death benefit tax charge on either a crystallised or uncrystallised pension fund, assuming the total value of the pension benefits are within the lifetime allowance. Death on, or after your 75th birthday If you die after age 75, your beneficiaries have three options;

(a) Take the whole fund as cash in one go: the pension fund will be subject to 45% tax. However, in the July 2015 Budget it was confirmed this will be taxed as your beneficiary's or beneficiaries' income for payments made after 5 April 2016.
(b) Take a regular income through an annuity or drawdown: the payments will be taxed as your beneficiary's or beneficiaries' income.
(c) Take periodical lump sums through drawdown: the lump-sum payments will be taxed as your beneficiary's or beneficiaries' income.

Under normal circumstances, no inheritance tax liability will arise from pension death benefits unless HMRC believe that an individual has deliberately deferred the crystallisation of their pension benefits to avoid tax charges.

SSASs are allowed to invest in a variety of ways and "connected person transactions" are now allowed provided they occur at "arms-length". The permitted investments include:

- Stocks and shares traded on any recognised stock exchange.
- Futures and options relating to stocks and shares traded on any recognised futures exchange.
- Units in an authorised unit trust.
- Shares in OEICs.
- Unregulated, non standard Investment Schemes
- Policies of insurance linked to unit-linked or investment funds of an insurance company resident in the UK.
- Traded endowment policies transacted with a person regulated by the FCA.
- Cash deposits in any currency.
- A freehold or leasehold interest in commercial property (including land).
- Ground rents, rent charges, ground annuals, feu duties or other annual payments reserved in respect of, or charged on, or issuing out of property except where the property concerned is occupied by a member of the scheme or a person connected with him.
- Individual pension accounts.

Property Investment via a SSAS

It is possible to invest directly in commercial property via a SSAS. The following should be considered when undertaking a commercial property purchase via a SSAS:

- The rent accumulates tax free within the scheme and the subsequent disposal of the property is exempt from capital gains tax.
- The lease must be on commercial terms and the administrator of the SSAS is required to take independent advice on the terms of the lease and the rent payable.
- Letting a property to a member's own business can also bring additional risks. If the business fails, the pension scheme may suffer investment losses as well as a reduction in future contributions.
- Investment in a single undertaking or having one investment as a large part of a scheme's assets brings considerable risk.
- Investment in commercial property needs to be treated with particular care. A property's potential marketability must be considered carefully because it will have to be sold before an annuity is secured.
- The problem can become even greater when several members effectively hold the property within their fund as often happens in a partnership.

A SSAS may only borrow towards the purchase of a freehold or leasehold interest in commercial property to be held as an investment of the scheme. The amount borrowed must not exceed 50% of the value of the individual pension assets.

Appendix – Technical Information on Unregulated Investment Schemes

Many Unregulated Investment Schemes (UIS) are sold to investors in the UK. Regulated CIS are those that are authorised by the Financial Conduct Authority (FCA) or are non-UK CIS that the FCA recognise. FCA recognition enables overseas CIS to be marketed to the general public in the UK and the FCA will only recognise an overseas scheme if certain specified criteria are met. If the FCA do not authorise or recognise a CIS in this way, it is classed as an Unregulated Investment Scheme (UIS). A UIS may be established, operated and/or managed in the UK or in a jurisdiction outside the UK.

UIS are described as unregulated because they are not subject to the same restrictions as a regulated CIS (e.g. in terms of their investment powers and how they are operated). Although the schemes themselves are not authorised or recognised, persons carrying on regulated activities in the UK in relation to UIS (including providing personal recommendations, arranging deals and establishing, operating and managing schemes) will be subject to FCA regulation.

All investments are subject to tax of some kind. Generally speaking, if the investment pays out regularly, the returns are taxed as income and investors are liable to income tax at their highest marginal rate. Alternatively, if the investment objectives are to generate a lump sum at the end of the investment term, or capital growth, then the gains enjoyed are subject to Capital Gains Tax.

However, it is not always as simple as this and the tax treatment of individual investments can vary from the general rules. Additionally, liability to tax will often depend on an investor's personal circumstances.

UIS investments cannot be held within an ISA because they are not regulated by the FCA.