

## 1. What is the purpose of this document?

The Financial Conduct Authority (FCA) is the independent watchdog that regulates financial services. The FCA has asked us to provide this important information to help you decide if our products and services are right for you. It identifies key features about our services and how you will pay for them. It does not contain all the features of our services. More detailed information can be found on our website in the Terms of Business/Terms and Conditions document appropriate for each of our services and in the key features and Key Investor Information documents for funds and our SIPP. Please read this document carefully and keep it for future reference.

## 2. What services does Bestinvest offer?

### a. Bestinvest Online Investment Service

The Bestinvest Online Investment Service consists of two services:

(i) an online, execution-only investment service where you make your own decisions about the investments that you buy and sell. Using our Bestinvest Online Investment Service, you can currently buy and sell online any combination of the investment types available through our services.

(ii) our Ready-made Portfolio service where we make available on an execution only basis for investment a number of Ready-made Portfolios. The Ready-made Portfolio service has distinct journeys as part of onboarding, purchasing investments and using features such as research tools.

We manage a range of multi-asset funds of funds structured as OEICs (Open-Ended Investment Companies). These provide a simple and convenient way of accessing our active approach to asset allocation using a carefully blended selection of investments. You can find further information on these funds on our website or by contacting our client services team.

Unless you select an add-on advice package (see below), you will not receive personal investment advice based on your circumstances as part of this service. We provide research, information about investments and tools, including coaching, to make it easier for you to make your own investment decisions. If you are unsure about the suitability of an investment please see our advice pages, or contact us to ask about our add-on advice packages.

### b. Bestinvest Advice Service

We currently have two add-on advice packages to the Bestinvest Online Investment Service:

1. **Investing for your goals** where we provide restricted investment advice on an investment solution suitable to your investment goals, and personal and financial circumstances.
2. **Portfolio health check** to run through your existing investments with you and recommend which you might want to keep or sell. We'll also recommend a suitable investment strategy for any cash or sales proceeds.

### c. Investment Types

- Each of our services can involve one or more of any of the following investments:
- Units and shares in collective investment schemes (funds);
- Shares in UK listed companies;
- Exchange Traded Funds (ETFs);
- Investment trusts; and
- Other products that may be made available during the course of you holding an account with us.

### d. Account Types

In order that you can manage your money and, should you wish, take advantage of the tax benefits that are normally available with ISAs and SIPPs, each of our services enables you to have up to three different types of account:

- i. **Investment Account:** this account enables you to invest money in any of the investments offered by our services and hold cash. This is also the account from which we may deduct any fees or charges arising from any of your accounts that are not covered by product charges.

- ii. ISA Account: this account is for investments that you wish to hold in our stocks and shares Individual Savings Account. We also offer Junior ISAs.
- iii. SIPP Account: this account is for investments that you wish to hold within our Self-Invested Personal Pension Account. We also offer Child SIPPs.

### 3. Whose products do we offer for our services?

The services provided by Bestinvest (Tilney Investment Management Services Limited) in these Key Facts are predominantly investment products (funds, shares and investment trusts). Custody of your investments is with SEI.

Typically, the ISA offered by our services is managed by Tilney Investment Management Services Limited and the trustee and scheme administrator for our SIPP, known as The Best SIPP, is EBS Pensions Limited.

### 4. What will you have to pay us for our services?

#### a. Charges that apply to all services:

##### Charges applied by the funds:

- i. Initial charge: for most funds offered by us through our services there is no initial charge - our website will confirm this, or tell you before you buy it if an initial charge applies.
- ii. Ongoing Charge Figure (OCF): this is the fund manager's annual management charge, plus additional third party costs and is taken annually by the fund manager from the value of the fund and for new purchases will normally be around 0.9% for equity funds, 0.3% for tracker funds and 0.6% for bond funds (although it could be higher or lower than this, as it is not set by us, but by the fund provider). For funds purchased historically, some fund managers charge a higher OCF but use part of it to pay Bestinvest an annual commission. Typically the commission is 0.5% a year but it can be anything between zero and 1% a year. We will rebate any commission we receive to you in full.
- iii. Stamp Duty Reserve Tax: this is currently 0.5% and applies to purchases of mainland UK registered companies that are UK listed (this does not apply to ETFs, OEICs, gilts, debentures, loan stock and offshore companies, such as Guernsey registered companies, that are UK listed).
- iv. PTM Levy: is a flat rate charge of £1 on all trades over £10,000, collected by the Panel on Takeovers and Mergers, who oversee all take-overs and mergers within the UK..
- v. Our advice fee: We charge a one-off fee upon receipt of a suitability report when using one of our add-on advice packages. Please see Table 5 for further details. Please see the fee tables from page 9 onwards for other fees that may apply to your account(s).

#### b. Charges specific to each service

##### i. Bestinvest Online Investment Service - custody provided by SEI Standard Tariff:

We charge a tiered fee based on the average daily value of all assets in your account, excluding cash. Fees accrue daily, are calculated using the day end closing value and are levied monthly in arrears.

For all account types, our tiered fee begins at 0.40% for assets up to £250,000 and reduces in levels down to 0% for any excess over £1,000,000.

By way of illustration, on a £100,000 investment in third party funds or shares the Bestinvest Online Investment Service fee would be calculated as follows:

Investment	Fee Rate	Tiered Charge
£100,000	0.40%	£400

On a £1,100,000 investment in third party funds or shares the Bestinvest Online Investment Service fee would be calculated as follows:

Investment	Fee Rate	Tiered Charge
First £250,000	0.40%	£1,000
£250,001 - £500,000	0.20%	£500
£500,001 - £1,000,000	0.10%	£500
£1,000,001 - £1,100,000	0.00%	£0
		<b>Total Charge £2,000</b>

Our dedicated pricing to hold our Ready-made Portfolio funds is the same as for third party funds and shares with the exception that the first £250,000 held in Ready-made Portfolios benefits from a lower fee of 0.2%.

By way of illustration, on a £100,000 investment the Bestinvest Online Investment Service fee would be calculated as follows:

Investment	Fee Rate	Tiered Charge
£100,000	0.20%	£200

On a £1,100,000 Ready-made Portfolio investment the Bestinvest Online Investment Service fee would be calculated as follows:

Investment	Fee Rate	Tiered Charge
First £250,000	0.20%	£500
£250,001 - £500,000	0.20%	£500
£500,001 - £1,000,000	0.10%	£500
£1,000,001 - £1,100,000	0.00%	£0
		<b>Total Charge £1,500</b>

Where customers hold both our Ready-made Portfolio funds and third party funds and shares, they benefit from the lower pricing on the Ready-made Portfolio component.

By way of illustration, on a £100,000 investment - split evenly between Ready-made Portfolios and third party funds or shares - the Bestinvest Online Investment Service fee would be calculated as follows:

Investment	Fee Rate	Tiered Charge
£100,000 Ready-made Portfolio holding	0.20%	£200
£200,000 third party funds or shares holding	0.40%	£800
		<b>Total Charge £1,000</b>

VAT is not currently applicable on the tiered service fee.

Online dealing in funds: there are no dealing fees or switch charges on investments in unit trusts and OEICs.

Online dealing in securities other than funds: you pay a dealing fee on each transaction (buy and sell) when investing online in securities, such as stocks and shares, ETFs and investment trusts. The standard online dealing fee is £4.95 per transaction. All quotes to buy stocks and shares, ETFs and investment trusts will tell you what the dealing fees are and any taxes or levies that apply. These are payable immediately.

The Bestinvest Online Investment Service is primarily an online service. If you place a deal in any type of investment by phone, each transaction currently costs £30. Certain securities can be illiquid; these tend to be small cap companies, investment trusts and ETFs, and it is not always possible to trade online. Phone-dealing rates apply in these circumstances.

We reserve the right not to make available certain products or investments in our commercial discretion depending on the service we provide and due to reasons related to liquidity, pricing, complexity or other risks to clients or us.

See Table 1 for a list of all charges applicable to the Bestinvest Online Investment Service – custody provided by SEI. This summarises the charges in respect of the Standard Tariff; in special circumstances and at our sole discretion other tariffs may be offered to you; please contact us if you are unsure which fees apply to you.

## Costs and charges when investing only in our Ready-made Portfolio funds

The table below highlights, for three illustrative investment amounts, the charges you may incur when you trade in our Ready-made Portfolio funds only on the Bestinvest Online Investment Service.

The illustrations assume:

- you trade only Ready-made Portfolio funds which are not subject to SDRT, PTM Levy or any Bestinvest dealing fees; and
- the average OCF for the underlying portfolio is 0.37% (a figure indicative of our Smart funds as at January 2022);

Fee	Illustrative Investment Amount		
	£10,000	£50,000	£250,000
Ongoing Charges Bestinvest Online Investment Service Fee	£20	£100	£500
<b>Total</b>	<b>£20</b>	<b>£100</b>	<b>£500</b>
<b>% of Investment</b>	<b>0.20%</b>	<b>0.20%</b>	<b>0.20%</b>
<b>Product Costs</b>			
Ongoing Charges Ongoing Charges Figure (OCF)	£37	£185	£925
<b>Total</b>	<b>£37</b>	<b>£195</b>	<b>£925</b>
<b>% of Investment</b>	<b>0.37%</b>	<b>0.37%</b>	<b>0.37%</b>
<b>Total</b>	<b>£57</b>	<b>£285</b>	<b>£1,425</b>
<b>% of Investment</b>	<b>0.57%</b>	<b>0.57%</b>	<b>0.57%</b>

## Costs and charges when investing in Collective Investments and UK Listed Equity

The table on the following page highlights, for three potential trade volume scenarios, the charges you may incur when you trade a portfolio of Collective Investments and UK Listed Equity on the Bestinvest Online Investment Service.

The illustrations assume:

- you invest £50,000
- you trade a portfolio of 75% Collective Investments and 25% UK Listed Equity;
- the average OCF for the Collective Investments in the portfolio is 0.67% (a figure indicative of a medium risk portfolio targeting capital growth); and
- one transaction is placed via telephone, rather than trading online.

Fee	Number of UK Listed Equity Transactions		
	2 Trades	5 Trades	10 Trades
<b>Service Costs</b>			
Ongoing Charges			
Bestinvest Online Investment Service Fee	£200	£200	£200
<b>% of Investment</b>	0.40%	0.40%	0.40%
<b>Transaction Costs</b>			
Online Dealing fee - purchase/sale UK stocks and shares	£9.90	£24.75	£49.50
Telephone transaction - fee for each telephone transaction (Bestinvest Online Investment Service only clients)	£30	£30	£30
Stamp Duty Reserve Tax (SDRT) - payable on mainland UK registered companies that are UK listed only. 0% on Exchange Traded Funds, OEICs, unit trusts, gilts, debentures, loan stock and offshore companies	£62.50	£62.50	£62.5
Subtotal	£102.40	£117.25	£142.0
<b>% of Investment</b>	0.20%	0.23%	0.28%
<b>Total</b>	<b>£302.40</b>	<b>£317.25</b>	<b>£342.00</b>
<b>% of investment</b>	<b>0.60%</b>	<b>0.63%</b>	<b>0.68%</b>
<b>Product Costs</b>			
Ongoing Charges			
Ongoing Charges Figure (OCF)	£251.25	£251.25	£251.25
Total	£251.25	£251.25	£251.25
% of Investment	0.50%	0.50%	0.50%
<b>Total Costs</b>	<b>£553.65</b>	<b>£568.50</b>	<b>£593.25</b>
<b>% of investment</b>	<b>1.11%</b>	<b>1.14%</b>	<b>1.19%</b>

## The Effect of Costs & Charges

The table below illustrates the possible impact of costs & charges when you trade and hold a portfolio of Collective Investments through the Bestinvest Online Investment Service.

The table assumes:

- you invest £50,000;
- you trade only Collective Investments which are not subject to SDRT, PTM Levy or any Bestinvest dealing fees; and
- the average OCF for the underlying portfolio is 0.67% (a figure indicative of a medium risk portfolio targeting capital growth).

	Over a 1 year period	Over a 5 year period
Example investment return	5%	27.63%
Example investment return after costs	3.93%	21.26%
Reduction in yield	1.07%	6.37%

## ii. SIPP Accounts

See Table 4 for charges applicable only to SIPP accounts (for assets under SEI custody on behalf of Bestinvest). Your SIPP provider may levy additional annual and ad hoc charges - please refer to their terms and conditions for further details.

## iii. Payment for ongoing services

The Bestinvest Online Investment Service is considered ongoing and charges will be applied on an annual basis in respect of the services provided. Details of these arrangements will be confirmed to you as part of the account opening process.

## iv. Cancellation of ongoing services

You may cancel the ongoing service you receive from the Bestinvest Online Investment Service at any time and change to another service of your choice, which may include a new ongoing service. If you decide not to change to another service and wish to cancel your account there may be transfer fees. Please see the transfer fee section in the applicable table listed later in this document. You may also be liable for any fees, costs, charges or expenses that have accrued to the date of termination. You should also refer to the Termination clause in the applicable Terms of Business.

## v. Fund-based commission

We will refund to you on a quarterly basis in full any fund-based annual commissions that we receive. This is a cash payment and will be credited to the same Account in which the respective commission-paying funds are held.

## vi. Is interest paid on cash?

Interest is calculated on the daily balance and paid monthly into your account. We may, at our discretion, vary the terms upon which interest is paid. We will notify you where we change those terms.

For cash held on your behalf by SEI (the "Custodian"), SEI will retain a portion of the interest earned and the remainder will be paid to you.

The current interest rates paid to you are:

Account Type	Cash Balance	Interest Rate (gross)
Investment Account	All balances	0.5% below the Bank of England base rate
ISA/JISA Account	All balances	0.5% below the Bank of England base rate
SIPP Account	All balances	0.5% below the Bank of England base rate

Interest is calculated on the daily balance and paid monthly into your account. We may, at our discretion, vary the terms upon which interest is paid.

## 5 Who regulates us?

Tilney Investment Management Services Limited, 6 Chesterfield Gardens, London, W1J 5BQ is authorised and regulated by the Financial Conduct Authority. Our firm reference number is 165169.

Our permitted business is advising on investments, managing investments, arranging custody, and dealing in investments as agents (including execution-only dealing).

You can check this on The Financial Services Register by visiting the FCA's website <https://register.fca.org.uk/s/> or by calling the FCA on 0845 606 1234.

## 6 What to do if you have a complaint?

If you wish to register a complaint, please contact us:

In writing to the Data Protection and Client Resolution Director at Bestinvest powered by Tilney, The Observatory, Western Road, Bracknell, Berkshire RG12 1TL

Telephone: 01344 828 000.

Email: [clientresolution@tilney.co.uk](mailto:clientresolution@tilney.co.uk)

If you cannot settle your complaint with us, you may be entitled to refer it to the Financial Ombudsman Service (FOS) ([financial-ombudsman.org.uk](https://www.financial-ombudsman.org.uk)).

If you wish to contact the FOS, please contact them;

- In writing: Exchange Tower, Harbour Exchange, London E14 9SR.
- By phone: 0800 023 4567.

## 7 Are you covered by the Financial Services Compensation Scheme (FSCS)?

You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim.

Should you be entitled to compensation from the Financial Services Compensation Scheme, you may be able to recover up to 100% of the first £85,000 that you have invested.

Further information about compensation arrangements is available from the FSCS. Their address is FSCS, 10th Floor, Beaufort House, 15 St Botolph Street, London, EC3A 7QU and their website is [fscs.org.uk](https://www.fscs.org.uk).

## 8 Who holds my investments?

For our non-advised services, the main appointed custodian for your investments, including cash, is SEI Investments (Europe) Limited ("SEI") whose address is First Floor, Alphabeta, 14-18 Finsbury Square, London EC2A 1BR. SEI is a UK custodian that is authorised and regulated by the FCA. Your investments are held in segregated accounts held in the name of SEI Global Nominees Limited, in accordance with the client money and assets rules of the Financial Conduct Authority.

## 9 How do I know you are giving me a fair deal on my investments?

Our procedures are designed to ensure that we obtain the best possible result for you. We have our own best execution policy (see the Terms of Business) that you agree to as part of opening an account with us. Where we use a Third Party Platform to execute your order they will be regulated by the FCA and also have an obligation to us to obtain best execution.

## 10 What happens if I change my mind about buying an investment?

### Bestinvest Online Investment Service

You have 14 days from the account opening date to cancel an Investment Account, ISA Account or Junior ISA account; 30 days from the account opening date to cancel a SIPP Account or a Child SIPP Account and 30 days to cancel following each transfer of a pension from another provider to your SIPP (for SIPPs, full details of cancellation rights can be found in the Best SIPP Key Features Document). Please be aware that if you cancel any investments as a result of exercising your cancellation rights you may get back more or less than you put in as a result of price movements over the period.

Please send any cancellation request to Bestinvest, 2nd Floor, Royal Liver Building, Pier Head, Liverpool, L3 1NY.

You do not have the right to cancel any other type of investment that you can make through our Services; in particular, you cannot cancel the purchase of funds or shares purchased within any type of account mentioned above, unless they are being cancelled as a result of the account itself being cancelled within the time periods specified above. Investments that you buy for your Investment Account or ISA Account can be sold and cash withdrawn at any time although you may get back more or less than you put in.

**Table 1**

Bestinvest Online Investment Service, Standard Tariff (Table 4 for SIPP Accounts also applies regarding additional standard charges)

FEE (excluding VAT)			
Fee Type	All account types	Is VAT Payable	When is fee due?
Bestinvest Online Investment Service Fee	Tiered fee - see tables 2 and 3	No	Paid monthly in arrears
Online dealing fee - purchase/sale funds (OEICs and unit trusts)	Free	-	-
Online fund switch fee	Free	-	-
Online dealing fee - purchase/ sale UK stocks and shares	£4.95	No	Upon completed transaction
Telephone transaction- fee for each telephone transaction	£30	No	Upon completed transaction
Stamp Duty Reserve Tax (SDRT) - payable on mainland UK registered companies that are UK listed only. 0% on Exchange Traded Funds, OEICs, unit trusts, gilts, de-bentures, loan stock and offshore companies	0.5% of the value of investment you buy this will be 1% on Irish registered stock	No	Upon completed transaction
PTM Levy (applicable on certain transactions over £10,000 on the LSE)	£1.00	No	At point of transaction
BACS charge	Free	-	-
CHAPS charge	£35	No	When actioned
Copy of tape of telephone conversation	Free	-	When actioned
Online statements, valuations and contract notes	Free	-	-
Paper statements, valuations and contract notes	£37.50 (covers all accounts)	Yes	Quarterly
Duplicate Valuation Statement or Contract Note charge (for each contract note)	£10	Yes	When actioned
Probate valuation	£10 per holding (min £50)	Yes	When actioned



Table 2 Tiered fee for the Bestinvest Online Investment Service Fee for Ready-made Portfolio investments	
Group Asset Band	Fee
£0 - £250,000	0.20% <sup>1</sup>
£250,001 - £500,000	0.20%
£500,000 - £1,000,000	0.10%
£1,000,000 +	0.00%

Table 3 Tiered fee for the Bestinvest Online Investment Service Fee for 3rd party funds and shares	
Group Asset Band	Fee
£0 - £250,000	0.40% <sup>1</sup>
£250,001 - £500,000	0.20%
£500,000 - £1,000,000	0.10%
£1,000,000 +	0.00%

<sup>1</sup> Floored at a minimum of £120 for all SIPPs except Child SIPPs

Note: Other fee tariffs may be offered at our discretion

Table 4			
Table of additional fees relevant to SIPPs			
	Fee (excluding VAT)	Is VAT Payable?	When is fee due?
Arranging death benefit	At cost	Yes	When actioned
Pension splitting on divorce	At cost	Yes	When actioned

Table 5		
Advice Fees		
	Fee	When is fee due?
Investing for your goals	£295 including VAT where applicable	Upon receipt of suitability report
Portfolio health check <sup>1</sup>	£495 including VAT where applicable	Upon receipt of suitability report

<sup>1</sup> See Schedule 1 for further details

Bestinvest is a trading name of Tilney Investment Management Services Limited.

Registered Office: 6 Chesterfield Gardens, Mayfair, W1J 5BQ. Registered in England and Wales. Registered No. 2830297. Authorised and regulated by the Financial Conduct Authority.

## **1. OUR SERVICE**

The portfolio health check is an optional, add-on service under which we provide recommendations based on our asset allocation models in accordance with the terms of the Bestinvest Terms of Business. Our asset allocation models combine different asset classes in pre-defined proportions to achieve targeted investment objectives within specified risk profiles. This service is designed for clients who want investment advice in respect of a portfolio in relation to which we exercise no discretion.

**1.1** We may provide our portfolio health check in relation to the following types of investment:

**1.1.1** Units and shares in regulated or unregulated collective investment schemes, including those which may be operated or advised by us or our group companies;

**1.1.2** Shares in UK or foreign companies;

**1.1.3** Exchange traded funds (ETFs);

**1.1.4** UK debt instruments, including government, public agency and corporate issues;

**1.1.5** Cash;

**1.1.6** Warrants, and

**1.1.7** Any other products or services we have made available to you prior to the date of the portfolio health check.

**1.2** In order for us to provide the portfolio health check, we will need to have a complete and accurate picture of your financial circumstances and investment objectives, and we will discuss this with you.

## **2. ADVISING IN RELATION TO YOUR PORTFOLIO**

**2.1** The recommendations we make in a portfolio health check are given on a one-off basis. The portfolio health check does not cover an ongoing review of the suitability of your investments. If you ever wish to have another portfolio health check in future, this would also be on a one-off basis.

**2.2** We will assess the suitability of each recommendation that we give in relation to financial instruments and/or investment services, including any recommendation whether or not to buy, hold or sell an investment within the framework of our asset allocation models. We will provide you with a written suitability report describing the outcome of our assessment before we assist you in implementing a recommendation, unless our recommendation is given at a distance (for example, by telephone) and you ask us to implement the recommendation before receiving the written suitability report which will then be provided to you following implementation of the recommendation.

**2.3** You should be aware that when we consider the suitability of our asset allocation models to you our advice is restricted to considering whether we reasonably believe that your stated investment objective can be achieved from our range of asset allocation models. This is not comprehensive financial planning advice and you should not rely on our portfolio health check for comprehensive financial planning advice. If you wish to obtain a more comprehensive financial planning service, please let us know and we will refer you to our separate financial planning service.

**2.4** The decision to implement or not to implement a recommendation will be exclusively yours. This means that it will be your responsibility to decide whether or not you wish to follow the recommendation in relation to a particular investment product, transaction or the use of a particular service. Any investment product or service that you take out in implementing a recommendation may be subject to separate terms and conditions.

**2.5** Where you decide to implement a recommendation, we will upon your request seek to assist you with the implementation of the recommendation e.g. by buying or selling investments for you. Where you delay the implementation of a recommendation, we may decline to assist you with the implementation if we reasonably believe that the recommendation is no longer suitable for you.

**2.6** You are responsible for paying for each transaction that we execute for you or that we pass to third parties for execution on your behalf, whether by payment of the purchase price, delivery of the relevant assets, or otherwise as the relevant market requires.

**2.7** You will need to ensure that you have enough available cash in your accounts in order for us to follow out your instructions (for instance purchasing additional investments.)

**2.8** The value of investments may go down as well as up. We give no assurance that implementing any advice given as part of a portfolio health check will increase the returns, value or profitability of your portfolio, nor that your investment objectives will be successfully achieved.