

## Product governance – platform and products

---

In this document, we share how we design, approve, market and manage our products throughout their lifecycle. We've also included information on our target market (for the products and services we offer) and summarised the product governance framework, committee, reporting and processes that we have put in place to meet our regulatory requirements.

The Financial Conduct Authority (FCA) introduced the Product Intervention and Product Governance Sourcebook (PROD) in 2018, to improve product oversight and governance processes of investment firms to protect the end investor. 'Product oversight and governance' means the systems and controls that financial firms put in place to design, approve, market and manage products throughout their lifecycle.

Our Product governance framework sets the standards we apply to product and service design and governance to ensure that:

- We put the interests of our clients at the heart of our product and service design
- We regularly review our product offering
- Our Executive Leadership are confident that our products and services are operating as expected
- We continue to meet our regulatory requirements
- Our products and services meet the requirements of the target market we've identified, and
- We distribute our products and services appropriately

Our product governance framework defines the processes that allow us to:

1. Identify the right target market for our products
2. Design and build products that meet the needs of customers in those target markets
3. Ensure that the products are distributed to customers in the target markets
4. Measure the performance of our products so that we can ensure they continue to meet the needs of the customers in our target markets
5. At least annually, continue to assess our products to ensure they meet the needs of our intended target market, and that they continue to promote good customer outcomes for our clients

All product assessments are reviewed and approved by our Product Governance Committee, including representatives from the Benchmark Executive Leadership Team.

## Target market

---

We're the manufacturer for the Fusion Wealth GIA, Fusion Wealth Stocks and Shares ISA, Fusion Wealth Junior ISA, Fusion Wealth SIPP, Bespoke Partner MPS and co-manufacturer for the Fusion Wealth Offshore Bond (with RL360). All the other third-party products that we offer through our platform (Pensions, Offshore Bonds and Onshore Bonds) are manufactured by other product providers. We've detailed the target market for our platform and products in the tables below.

## Platform target market

Target market identification	Fusion Wealth Platform
<b>Type of clients</b>	<p>Our Fusion Wealth Platform is only open to retail clients (as defined within the FCA Rules) who are receiving advice from an appointed, qualified financial adviser that is:</p> <ul style="list-style-type: none"> <li>– Authorised under an FCA regulated and authorised financial advice firm</li> <li>– Has a Fusion Wealth Terms of Business contract in place</li> <li>– Has completed suitability and risk profiling assessments</li> </ul> <p>We cannot accept applications from US Persons in our GIA, ISA, JISA, SIPP and Bespoke Partners MPS products, however, they may be accepted for third-party products if the provider permits.</p>
<b>Knowledge and experience</b>	<p>Our platform is suitable for clients that have, or their representative has (where an individual has been appointed to make investment decisions on behalf of a client), a basic level of financial knowledge or above. It is their financial adviser's responsibility to ensure that the discretionary investment strategy or investments selected are appropriate for their client.</p>
<b>Financial situation with a focus on the ability to bear losses</b>	<p>The potential for loss varies for each client depending on the underlying investments agreed between the client and their financial adviser. It is the responsibility of a client's financial adviser to recommend a discretionary investment strategy, or selection of appropriate assets, to meet each client's ability to bear loss. Our products offer no capital guarantee, so are generally suitable for clients with some ability to bear loss.</p>
<b>Risk tolerance and compatibility of the risk/reward profile</b>	<p>Our products are suitable for clients with varying degrees of risk tolerance and it is their adviser's responsibility to ensure the appropriate investment strategy or investments selected meet each client's appetite for risk. The potential for risk and reward will change depending on the underlying investments selected.</p>
<b>Clients' objectives and needs</b>	<p>Our clients have a variety of objectives and needs, which are met through the application of an appropriate discretionary investment strategy, or selection of appropriate assets, chosen by the client and their financial adviser together. The wide variety of assets available on our platform gives flexibility to meet the investment needs and objectives of the client, including assets that comply with Islamic principles, also known as Shariah compliant.</p> <p>Some of our clients may show characteristics of vulnerability. In these instances, we work with advisers to deliver good client outcomes that take into consideration the particular circumstances of their vulnerability and making reasonable adjustments for them.</p>
<b>Distribution strategy</b>	<p>All our available products, including third-party products, are distributed through our Fusion Wealth Platform by financial adviser firms that have a Fusion Wealth Terms of Business contract in place.</p>
<b>Negative target market</b>	<p>Our platform is not suitable for clients that:</p> <ul style="list-style-type: none"> <li>– Do not have a financial adviser or have not been provided with financial advice</li> <li>– Have no ability to sustain capital loss, seeking full capital protection, requiring guaranteed income or are fully risk adverse</li> <li>– Want to invest in physical or complex assets</li> <li>– Are a US Person wishing to invest in our GIA, ISA, JISA and SIPP products</li> <li>– Are a non-UK resident wishing to invest in our ISA, JISA and SIPP products</li> <li>– Are not able to invest minimum premiums, where this applies</li> </ul>

## Product specific target market

Target market	GIA	ISA	JISA	SIPP	Offshore Bond	Bespoke Partners MPS
<b>Age</b>	Over 18s	Over 18s	Under 18s	None	Over 18s	Dependent on the criteria of the Fusion Wealth product that the Bespoke Partner MPS is accessed via.
<b>Residency</b>	No EEA clients	UK residents only	UK residents only	UK residents only	No restrictions	Dependent on the criteria of the Fusion Wealth product that the Bespoke Partner MPS is accessed via.
<b>US Persons</b>	Not accepted	Not accepted	Not accepted	Not accepted	Yes	Accepted for our Offshore Bond, and third-party products at the providers discretion.
<b>Investment allowances</b>	None	£20,000 maximum annual contribution	£9,000 maximum annual contribution	Dependant on client's circumstances	£50,000 minimum cash premium	Dependent on the criteria of the Fusion Wealth product that the Bespoke Partner MPS is accessed via.
<b>Negative target market</b>	Under 18s US Persons EEA residents	Under 18s US Persons Non-UK residents	Over 18s US Persons Non-UK residents	US Persons Non-UK residents	Clients with less than £50K premium to invest.	Advisory and Execution Only clients. Advised clients from firms other than the Bespoke Partner firm. Clients not eligible to invest into a UK regulated product. US Person applying for our GIA, ISA, JISA and SIPP products, and some third-party products at the providers discretion.
<b>Distribution strategy</b>	Our products are distributed exclusively through our Fusion Wealth Platform by financial adviser firms that have a Fusion Wealth Terms of Business contract in place.					

## Distribution arrangements

---

We are the distributor for all products available through the Fusion Wealth Platform, this includes products manufactured by us and by third-party providers.

As a distributor that offers, sells, or provides investment services to clients, we must ensure that:

1. We understand the products we offer
2. We assess the compatibility of the products with the needs of our clients
3. We ensure the products are only offered where they are in the interest of the client
4. We carry out periodic reviews to ensure this remains the case

All products are distributed through authorised, FCA regulated financial advice firms that have a Fusion Wealth Terms of Business contract in place.

Authorised financial advisers are responsible for evaluating their client's suitability, based on their personal and financial circumstances, and for providing their clients with all relevant information relating to the products they have recommended (including illustrations, key features documents, charges information and the platform terms and conditions).

As a distributor, we regularly report on any sales outside of our target market or our defined negative target market, and we will also inform the manufacturer if a fund managers product is identified. We also work with Discretionary Fund Managers and Model Portfolio Service Providers to identify sales outside of our target market. As part of our reporting, we may need to provide the manufacturer with details of any onward distributor, including financial advisers.