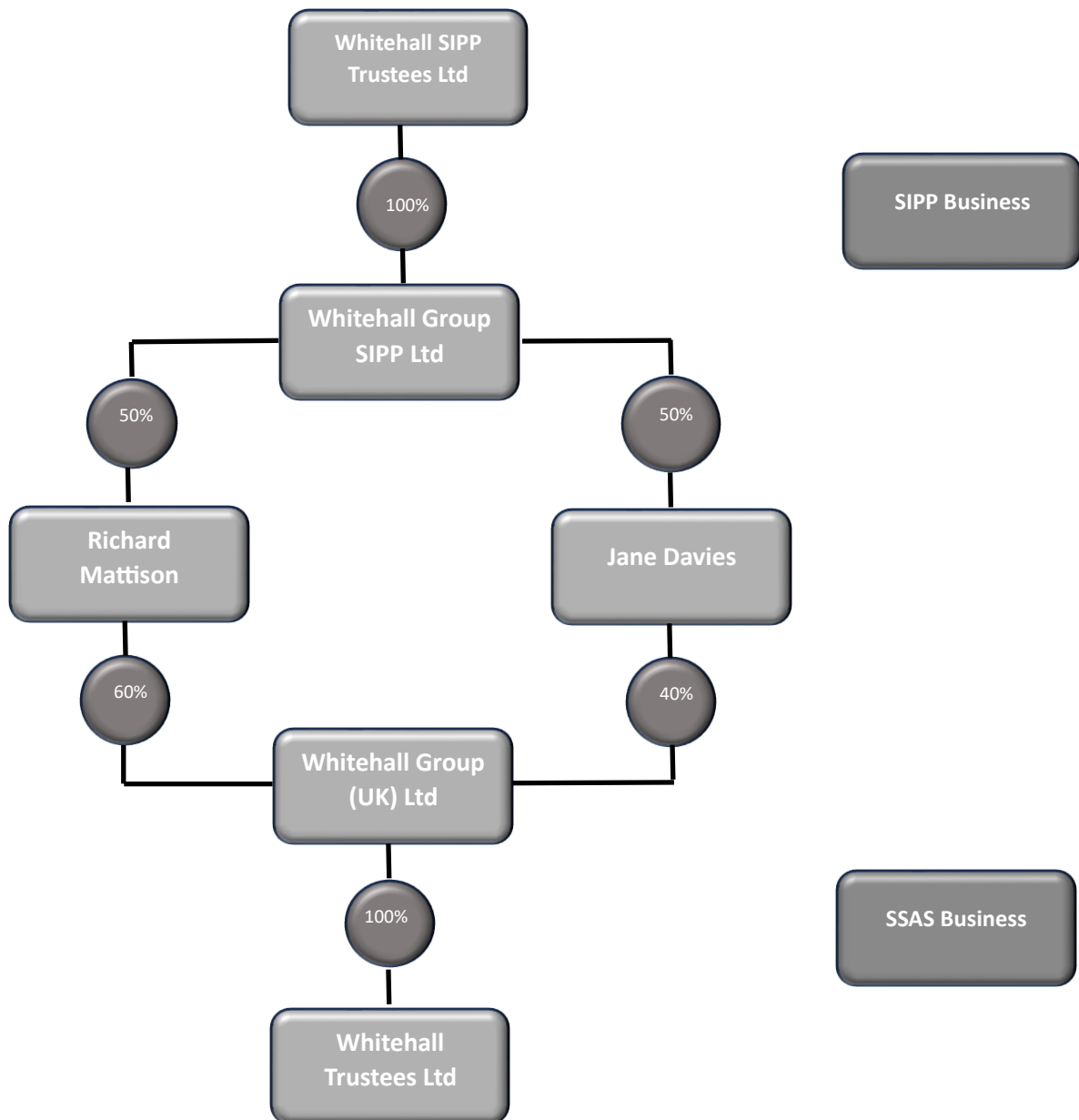




# SIPP Due Diligence and Product Information

## 1. Ownership

Whitehall Group was formed in late 2011 by Richard Mattison and Jane Davies who at that time had already enjoyed lengthy careers in the self-invested pensions market. The company has traded profitably since that time. The current ownership structure is as follows:



The business is independently owned and has no business links to fund managers, insurance companies or firms of financial advisers. Our independence gives us our ability to focus on the needs of the customer with no conflicts of interest.

## 2. Director Biographies



Jane Davies BA (Hons) Cert PFS

Jane's career in pensions started in the mid-1990's as a technician in Friends Provident's pension department. She moved into the SSAS market in 2003 as a client account manager for what was then called Santhouse Whittington based in Manchester. She moved through the ranks to become a business development manager and director of the firm's trustee companies.

As part of her progression Jane also undertook roles in SIPP operation, sales and marketing and helped drive the company's product launches to award-winning success.

In her role as Director of Whitehall Group Janes holds the Senior Management function of SMF3 (Executive Director).

Jane can be contacted on [jane.davies@whitehallgroup.co.uk](mailto:jane.davies@whitehallgroup.co.uk)



Richard Mattison BSC (Hons)  
ACII Dip PFS

Richard's financial services career extends as far back as 1988 with his first post-university job in life insurance claims. He moved into the world of SSAS in 1990 for the original incarnation of James Hay Pension Trustees. After four years Richard moved to London for a position as administrator for the PAL Partnership. Like Jane, Richard's career progressed to director as the company went through a series of mergers and acquisitions to reincarnate itself as James Hay.

During this time Richard moved from SSAS specialist to SIPP specialist, launching, operating and selling award-winning SIPP products.

At Whitehall Richard performs the Senior Management functions of SMF3, SMF16 and SMF17 (MLRO)

Richard can be contacted on [richard.mattison@whitehallgroup.co.uk](mailto:richard.mattison@whitehallgroup.co.uk)

## 3. Company Roles and Structure

Company	Whitehall Group SIPP Ltd	Whitehall SIPP Trustees Ltd
Role	SIPP Provider and Scheme Administrator	Trustee Company
Registered Number	13577749	13587700
Registered Address	8-10 Bolton Street, Ramsbottom, BLO 9HX	8-10 Bolton Street, Ramsbottom, BLO 9HX
FCA Number	978183	
Regulatory Permissions	Establishing, Operating and Winding-up a personal pension scheme	Bare trustee of SIPP trust

Control but not hold client money	Co-owner of SIPP assets
	Operate SIPP bank account under a mandate from the SIPP Administrator

The structure of the Whitehall SIPP is a trust governed by a trust deed and rules so that client assets are legally ring-fenced from the above companies. The assets are legally owned by the trustees. Whitehall SIPP Trustees Ltd is a non-trading company that has no assets or liabilities of its own.

## 4. Financial Strength

Company	Whitehall Group (UK) Ltd	Whitehall Group SIPP Ltd
Product Provided	SSAS	SIPP
Product launch date	December 2011	March 2024
Scheme Numbers	1,790	Nil (new product launch)
Assets under Administration	£1,117,000,000	Nil (new product launch)
Experian Delphi Credit Rating	92/100 (very low risk)	N/A (new product launch)
% of capital adequacy held	N/A	100%
FSCS Protection	£85,000 for deposits FCA authorised investments are protected	£85,000 for deposits FCA authorised investments are protected
Trust structure risk management	Separate administration and trustee companies	Separate administration and trustee companies
	Separates the trading activity of the company from the client assets	Separates the trading activity of the company from the client assets
	Protects client assets in accordance with regulatory requirements and best practice	Protects client assets in accordance with regulatory requirements and best practice
	We are unable to use scheme assets for our own benefit	We are unable to use scheme assets for our own benefit
	Members instruct investments in accordance with the trust deed and rules ("member directed")	Members instruct investments in accordance with the trust deed and rules ("member directed")

## 5. Permitted Investments

The Whitehall SIPP permits "Standard Assets" only as defined by the Financial Conduct Authority (FCA).

These are listed in the Personal Pension Scheme Operators (Capital Requirements) Instrument 2014.

Many years of market experience means we are familiar with all investment types	We can handle complex commercial property investment	Our target market and fair value assessment gives a minimum fund size of £100,000
Most standard assets are accessed via platform, stockbroker and discretionary fund manager accounts	We monitor assets held in these accounts to comply with FCA requirements	Standard assets must be capable of being sold within 30 days and accurately valued



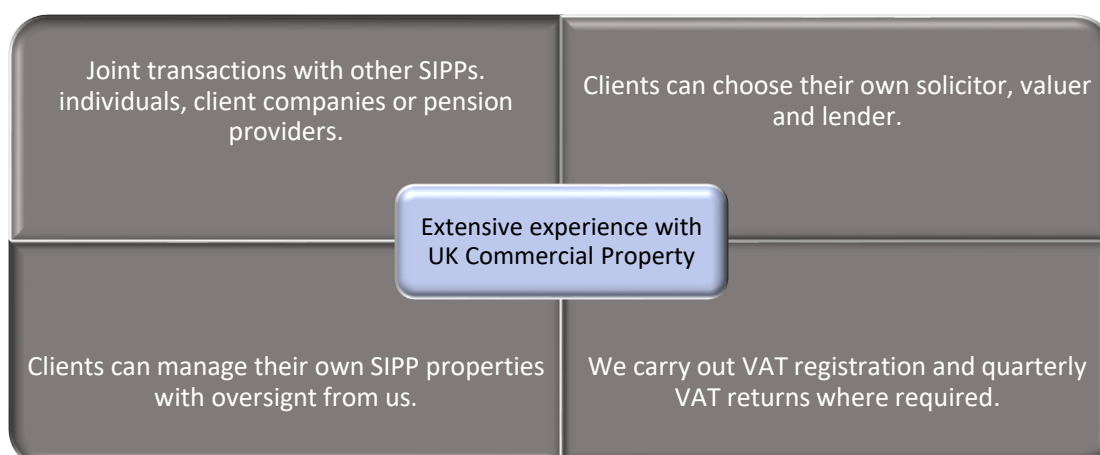
Please note that quoted shares must be quoted on the London Stock Exchange, the Alternative Investment Market or an overseas investment exchange recognised by HM Revenue & Customs.

Each SIPP has a cash account with our chosen bank. This is a pooled client account managed by ourselves which is reconciled daily. This is designed to be a servicing account and not an investment account meaning the interest rate may not be competitive. We receive an interest share from the bank of 50% of interest paid up to a maximum of 0.8%.

We have pre-agreed arrangements with fund managers and platforms which can be accessed via the Whitehall SIPP. If you wish to utilise a different firm, we can approach them to establish a relationship.

Any investments not on the above list cannot be used by the Whitehall SIPP but may be possible with a SSAS. Please feel free to contact us to discuss.

## 6. Commercial Property Services



## 7. Service Proposition

At Whitehall Group we put our clients at the heart of everything we do. We strive to be efficient, knowledgeable and friendly and embed our company values of Integrity, Understanding, Respect, Ambition and Responsibility into all aspects of our operation.

	SSAS	SIPP
Operational Structure	Every client has a designated director responsible for governance and oversight	Every client has a designated director responsible for governance and oversight
	Every client has a designated Account Manager responsible for day-to-day administration and the first point of contact	Every client has a designated Account Manager responsible for day-to-day administration and the first point of contact
	We have a specialist technical team for specific transactions: commercial property, loans, private equity and benefits	We have a specialist commercial property function
	We have a specialist central operations team for banking, pension payroll and regulatory reporting	We have a specialist central operations team for banking, pension payroll and regulatory reporting
Target Market	We target retail customers who are business owners or former business owners with a level of financial sophistication to understand the product and risks involved	We target retail customers who have a level of financial sophistication to understand the product and risks involved
	We do not give financial advice	We do not give financial advice
	We will accept business only from regulated and authorised financial adviser firms and from direct clients, after a vetting process. This involves confirming the appropriateness of the type of the proposed investments and the initial fund size.	We will accept business only from regulated and authorised financial adviser firms and from direct clients, after a vetting process. This involves confirming the appropriateness of the type of the proposed investments and the initial fund size.
	Our fair value assessment has established a minimum fund size within the first year of £150,000	Our fair value assessment has established a minimum fund size within the first year of £100,000
Support	All our staff are put through a continual process of training and development	All our staff are put through a continual process of training and development
	We provide pre-sales support including face-to face meetings if desired	We provide pre-sales support including illustrations and face-to face meetings if desired
	Adviser training can be provided via video call or face to face	Adviser training can be provided via video call or face to face
	We provide a range of written material including sales aids, technical guidelines and newsletters	We provide a range of written material including sales aids, technical guidelines and newsletters
	This can be facilitated through the SSAS bank account or via platform or fund manager investments	This can be facilitated through the SIPP bank account or via platform or fund manager investments
Online facilities	These are provided through our bespoke system known as Topas	These are provided through our bespoke system known as HIVE

## 8. SIPP Compliance Structure

Our goal is to maintain compliance within the FCA's regulations and to operate in a compliant manner at all times.

Asset Acceptance	The Whitehall SIPP accepts Standard Assets only as defined by the Financial Conduct Authority (FCA). This model has been agreed with the FCA as a key element in our risk mitigation process
Defined Benefit Transfers	The Whitehall SIPP will only accept Defined Benefit (Final Salary) transfers where there has been positive advice to transfer from a duly authorised and regulated adviser. This model has been agreed with the FCA as a key element in our risk mitigation process
Consumer Duty	Whitehall Group SIPP Limited is a Manufacturer and Distributor of pension products Please see our Target Market and Fair Value Statement for full details
Data Protection	All data held is subject to the General Data Protection Regulation (GDPR) as determined by the Information Commissioner (ICO). Whitehall Group SIPP Limited is registered with the ICO as a Data Controller
Business Continuity	In the event of a catastrophic failure to our existing premises or systems and to ensure business can continue, we can operate from any location, accessing our replicated data in the cloud
Fraud Prevention	We maintain rigid systems and controls to prevent internal fraud. These include senior staff authorised to sign documents, daily banking reconciliation, regular asset reconciliation, restricted banking access to designated staff and dual authorisation of all payments
Anti-money Laundering	We adhere to industry guidelines as set out by the Joint Money Laundering Steering Group. We ask for documentary evidence to identify clients, source of funds and source of wealth. We use SmartSearch for electronic verification.

## 9. Awards and Accreditation

Whitehall Group (UK) Ltd has five stars from Defaqto

Whitehall Group (UK) Ltd has five stars from Moneyfacts

We achieve Cyber Essential accreditation through our regular assessment process



Whitehall Group (UK) Ltd is a multiple award winner with Moneyfacts

We are a member of our trade association, the Association of Member-Directed Pension Schemes (AMPS)



We feature on the Synaptic and Defaqto research comparison systems



**Whitehall Group**  
**8-10 Bolton Street**  
**Ramsbottom**  
**BLO 9HX**

Contact Us:

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Email: [sipp@whitehallgroup.co.uk](mailto:sipp@whitehallgroup.co.uk)



Whitehall is the trading name of:

Whitehall Group (UK) Limited, a company registered in England and Wales (Registered number 07625300), Whitehall Trustees Limited, a company registered in England and Wales (Registered number 07625294), Whitehall Corporate Limited, a company registered in England and Wales (Registered number 7759590), Whitehall Group SIPP Limited, a company registered in England and Wales (Registered number 13577749) and Whitehall SIPP Trustees Limited, a company registered in England and Wales (Registered number 13587700). All companies have their registered office at 8-10 Bolton Street, Ramsbottom, BLO 9HX.

Whitehall Group SIPP Limited is authorised and regulated by the Financial Conduct Authority (FCA) firm reference number 978183.