



WHITEHALL

Whitehall SIPP Key Features

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The Financial Conduct Authority is a financial services regulator. It requires us, Whitehall Group SIPP Ltd, to give you this important information to help you to decide whether our Whitehall SIPP is right for you. You should read this document carefully so that you understand what you are buying, and then keep it safe for future reference.

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1. Helping You Decide

This document provides you with information about the main features of the Whitehall SIPP ("SIPP"). It describes the aims of the product, what you will be committing to and the risks associated with the SIPP. If you are unsure whether the SIPP is right for you, you should seek advice from a regulated financial adviser.

How it Works - The Tax Advantages



Further Information

If you have a financial adviser, this should be your first point of contact if you have any questions about your SIPP.

More detailed information is available from the SIPP Rules, Terms and Conditions and our Fee Schedule. A copy of the SIPP Rules is available for inspection on request. We will also provide you with an illustration at outset of your expected eventual retirement benefits and annually thereafter.

Its Aims

- To provide a tax efficient way to save for your retirement.
- To provide a retirement income, or to take a lump sum payment in lieu of part of such income.
- To give you the option of choosing when you draw benefits and being able to take the benefits in stages if desired. Please note benefits cannot be taken before age 55 (57 in 2028), unless exceptional circumstances apply, such as incapacity due to ill health.
- To provide a pension or a lump sum for beneficiaries on your death.
- To give you the option of choosing from a wide range of investment opportunities, to build up your pension fund, including commercial property.
- Flexibility on payments into the scheme to reflect changes in your personal and financial circumstances.

2. Your Commitment

- To pay at least one payment into your SIPP. This can be via a transfer of previous pension benefits and/or contributions.
- To read carefully the rules governing your SIPP and to ask questions about any matter which is not clear to you.
- To understand the features of the SIPP and to adhere to the rules of the SIPP.
- To inform us if your pension contributions to all your pension arrangements in a given tax year exceed your annual earnings for that tax year.
- Any taxfree lump sum that you take will not exceed the limits set by HM Revenue & Customs ("**HMRC**").
- You will tell us if you stop being entitled to receive tax relief on your contributions.
- Apart from exceptional circumstances such as serious ill health, you will not access your pension benefits earlier than age 55 (57 in 2028).
- You, and where applicable your adviser, review your investment strategy to monitor that the funds invested within your SIPP remain on track to meet your investment objectives.
- To take responsibility for your investment decisions.
- You will tell us about any pension benefits you have accessed from any other product/product provider.
- To pay our fees promptly as outlined within our fee schedule, as amended from time to time.
- To complete paperwork when required in connection with the ongoing administration and the subsequent arranging of investments.
- To read our Whitehall SIPP Terms and Conditions, this Key Features Document and any other documentation which we provide you with, very carefully. All of our terms are on our website: www.whitehallgroup.co.uk.
- If you fail to maintain the commitments in respect of HMRC rules, you may be liable for punitive tax charges and penalties levied by HMRC, and your pension and cash benefits may be seriously affected.

3. The Risks

Many things could happen to affect the level of your pension at retirement. Any illustration you may receive is an indication only, based on statutory assumptions which SIPP providers must adhere to.

Pension Transfers and Contributions

- If you are transferring benefits into your SIPP from another pension scheme, there is no guarantee that the benefits from your SIPP will be greater than you would have received from the other pension scheme. You may get back less than you invested. In addition, you may also be giving up certain rights in the other pension scheme that are not provided by your new SIPP such as death benefits, or a guaranteed rate to convert your pension fund into pension income when you take benefits (known as a guaranteed annuity rate).
- Ceasing or reducing contributions when the intention was to pay regular contributions will be likely to result in a lower than expected fund at retirement.

Investment Risks

- Your benefits will be affected by investment performance. Investment performance cannot be guaranteed, and the value of your SIPP can go up or down.
- The investments that you select for your SIPP will have different levels of risk. Past performance is not a guide to future returns.

- Some investments, for example, commercial property, typically will take longer to sell than others and you will need to take this into account when you consider drawing your pension benefits. Property valuation is a matter of judgment by a professional valuer.
- The value of your investments and any income from them may fall as well as rise and is not guaranteed. You may get back less than you invest.

Withdrawals

- If you commence withdrawals earlier than expected, your funds may not last as long.
- The income from your SIPP is not guaranteed and depends on the total value you have accumulated.
- You have to pay income tax at your applicable rate on withdrawals above your tax-free lump sum.
- While your fund stays in your SIPP it benefits from tax advantages that are not available on withdrawn funds.

Fees and Charges

- Charges to your SIPP and charges on the underlying investments may change.
- If the value of your SIPP is small you may find our fees are disproportionately high and you do not receive value for money

.Please also note that tax rules and legislation may change which can affect your SIPP.

4. Questions and Answers

What is a SIPP?

A SIPP is a Self-Invested Personal Pension for those who are comfortable making their own Investment decisions. SIPPs are normally designed to offer the investor a wider range of investment choices than more traditional personal pension plans, particularly commercial property.

Am I allowed a SIPP?

You can have a SIPP if you are a UK resident. If you are resident overseas you can have a SIPP but only to transfer funds from another UK-registered pension scheme.

If you are under age 18, a parent, guardian or grandparent can pay into your SIPP.

Is this a Stakeholder or Auto Enrolment Related Pension?

No. The Government has set minimum standards for a Stakeholder pension at autoenrolment. These are to do with payment levels, charges, and terms and conditions. This plan is not a Stakeholder or autoenrolment pension because our charges can be higher than the government standards for these types of plans. Therefore, a stakeholder pension scheme could meet your needs as well as the Whitehall SIPP.

As Whitehall doesn't offer advice, we are unable to suggest which type of plan suits you and suggest you contact a Financial Adviser.

Can I change my mind?

Where your SIPP has been established for over 30 days you cannot cancel the SIPP and would have to transfer your funds to another pension scheme. However, there are two circumstances where you can change your mind and invoke "cancellation rights":

1. Transfer of funds from other pension arrangements to your SIPP

Upon receipt of a request to transfer benefits from another scheme to the SIPP you will be issued with a cancellation notice allowing you 30 days to change your mind. Please note that if you do change your mind regarding any transfer to the SIPP it may not be possible as the original provider may not accept any return of funds to the original pension arrangement. In this case you would need to arrange for another pension arrangement to accept the transfer. Charges will however still be payable due to the work already undertaken in respect of the transfer to your SIPP.

2. Upon taking benefits for the first time from your SIPP

Having accepted a quotation of retirement benefits provided by us at the point you are looking to take benefits from your SIPP, you will be issued with a cancellation notice allowing you 30 days to change your mind.

If you decide to cancel the commencement of your benefits from the scheme within the 30 day period, then you will be obliged to return any payment received in respect of the transaction. All refunds made will be net of any adviser fees or our fees already paid.

CONTRIBUTIONS AND LIMITS

How much can I contribute to my SIPP?

There is no minimum level of regular or single contributions. Nor is there any minimum transfer value if you wish to transfer in monies from other pension arrangements. HMRC have set limits on the total amount on which a SIPP can claim tax relief on your behalf to add to your pension pot (called relief at source). Please also see the later section titled "what is the Annual Allowance".

Personal contributions

Currently at the time of writing, in any tax year you can pay up to £3,600 gross with no reference to your earnings. If you are earning more than this you can pay up to 100% of your relevant UK earnings. This limit applies to the total contributions made to all your pension plans not just this SIPP. Personal contributions to your SIPP are paid net of basic rate tax. We will reclaim this from HMRC on your behalf and add this to your SIPP (relief at source). If you are a higher rate or additional rate taxpayer, the additional relief must be claimed by you personally, through your selfassessment tax return.

For example, if basic rate tax is 20%, for every £500 you personally pay to your SIPP we will reclaim £125 making the gross amount £625.

You cannot pay personal contributions to your SIPP after age 75.

Employer contributions

The HMRC limits do not apply to any contributions paid by your employer, however any contributions made on your behalf will count towards your annual allowance (see below). Employer contributions will be deductible for the employer's tax purposes to the same extent as other expenses for a trading company. They will be subject to the "wholly and exclusively for the purposes of the trade" test.

Your employer can continue to pay contributions to your SIPP after age 75.

Transfer payments

The HMRC limits do not apply to any transfer payments made into your SIPP from another pension arrangement.

HOW CAN I MAKE PAYMENTS INTO MY SIPP?

Regular contributions

If you or your employer will be making regular contributions into your SIPP, please set up a standing order to credit your SIPP bank account. We can provide the bank details on request. You can stop or restart payments at any time by contacting us.

Single contributions

Single contributions by you or your employer can be made at any time by cheque or electronic payment into your SIPP bank account. All contributions must be accompanied by a completed contribution form.

You cannot pay contributions by transferring investments such as shares or commercial property.

Transfers in

You can transfer funds either as cash, or sometimes directly in the form of other assets into your SIPP from other UK registered pension schemes, including schemes you are already receiving an income from. As we do not provide advice we recommend that you seek expert financial advice before any transfer to assure you are fully aware of the potential risks.

If you want to transfer from a defined benefit (final salary) pension scheme you must obtain advice from a suitably qualified financial adviser. We will not accept the transfer if they advise you not to transfer.

You are not allowed to transfer from most public sector pension schemes.

What is the “Annual Allowance”?

Please note that HMRC has set an Annual Allowance for the tax relief on pension savings. This is the total contributions that you, your employer and any third party can make to all your pension arrangements each tax year (to 5th April), including this SIPP (pension transfers and investment income such as rent are not included in the calculation). The Annual Allowance is set each year by the Treasury.

There are two situations where your annual allowance may be lower than normal:

- If you have “flexibly accessed” any of your pension savings (please refer to the section on Benefits below), your annual allowance is reduced to a lower amount.
- For those receiving high earnings there is a Tapered Annual Allowance where your allowance is reduced depending on the level of your earnings

If your contributions exceed the Annual Allowance you will have to pay a tax charge, effectively cancelling out any tax relief on the excess.

HM Revenue & Customs practice and the law relating to taxation are complex and subject to individual circumstances and also policy and legislative changes which cannot be foreseen. Please contact us or refer to our contribution guideline on our website for full details.

INVESTMENTS

What can I invest in?

You can choose how your fund is invested subject to certain limits and safeguards in the scheme rules and relevant tax legislation. You can take full responsibility for your investment decisions or you can take advice from anyone duly authorised to give investment advice.

Investments permitted are limited to “standard investments” as defined by the Financial Conduct Authority (FCA) and include:

- Cash,
- Shares quoted on the London and recognised overseas Stock Exchanges,
- Unit trusts, open ended investment companies, (OEICs) and investment trusts,
- Insurance company funds,
- UK commercial property and land,
- Gold bullion
- In addition, your SIPP can borrow up to 50% of its (net) value at any time. This can be a useful feature to assist with funding commercial property purchase.

A Standard Asset must be capable of being accurately and fairly valued on an ongoing basis and readily realised (i.e. sold) within 30 days whenever required. Valuations should be undertaken in accordance with the generally accepted standards used in the relevant sector for that asset.

Are there any investments or transactions that are not allowed?

The following investments and transactions are prohibited:

- Loans to you or anyone connected with you,
- Residential property including buy-to-let (except “job-related” residential property),
- Shares in unquoted companies,
- Tangible moveable property (this can mean plant and machinery as well as items more obviously capable of private use, such as paintings, vintage cars, wine or other “personal chattels”).

The Rules give us the right to refuse any investment request. Circumstances where this may be necessary are if we consider that it might result in substantial adverse tax charges, it may not be consistent with the Rules of the scheme or prevent the payment of fees properly due, or it would be likely to carry unacceptable risks or require unduly complex administration. We will discuss any such instance with you should this arise.

How will I know how my investments are doing?

We will provide you with an annual illustration of your SIPP and adhoc valuations can be made available upon request. You will also have online access to details of your SIPP at any time.

How will Investments in my SIPP be taxed?

The funds within SIPP will accrue broadly free of income and capital gains tax. Where applicable, we will reclaim any tax relief deducted from Income received. (Please note that tax credits withheld on dividend payments from UK equities and any tax withheld overseas cannot be reclaimed).

How often is my SIPP valued?

For reporting and legislation purposes we require at least annual valuations of the investments of your SIPP to be provided, triennial for commercial property, plus the availability of ad hoc valuations for events such as retirement benefit calculations.

We are reliant on third parties to provide valuations. If you choose to invest in commercial property, you will be required to obtain and provide us with a valuation of the property every three years as a minimum, unless required sooner.

If the property is intended to be sold to a connected party you will be required to obtain an up-to-date valuation of the property. If the property is intended to be sold to an unconnected party, a valuation is not required for the sale itself but you will still be required to obtain a valuation of the property every three years minimum should the sale be prolonged. The valuation must be carried out by a qualified member of The Royal Institution of Chartered Surveyors ("RICS") who should be Independent from you.

Fees incurred for obtaining the valuation can be paid or reimbursed from cash funds in the pension scheme upon receipt of an appropriate invoice and providing that sufficient funds are available. In the event valuations are not provided, the value of the investment may need to be noted as NIL until an accurate valuation is made available.

PENSION BENEFITS

Where can I get advice about taking benefits from my SIPP?

We strongly recommend that you seek financial advice from an independent financial adviser (IFA) before making a decision about drawing your pension benefits. You are also entitled to free and impartial advice about pension benefit options from the Governmentsponsored "Pension Wise" service (<http://www.pensionwise.gov.uk>). This service is provided by the Citizens Advice Bureau (for face to face advice) and Moneyhelper (<https://www.moneyhelper.org.uk/en/pensions-and-retirement/pension-wise>) for telephone advice.

How will I know what my benefits are likely to be?

We will provide you with an illustration each year, to give you an idea of what the level of your benefits might eventually be.

When can I take benefits?

You can start taking benefits at any time from age 55 and you are not required to retire from employment/selfemployment in order to do so. There is no maximum age before which you have to start drawing benefits. From 2028 the age you can withdraw benefits will rise to 57 years.

If you are in serious ill health you may be able to start taking benefits early.

Do I have to take all my benefits in one go?

No. Applying funds to provide benefits is known as a Benefit Crystallisation Event ("BCE"). You do not have to apply all the funds in your SIPP for benefits at the same time but can 'phase' the taking or 'crystallisation' of benefits.

What sorts of pension benefits can I take from my SIPP?

You have a number of options for taking money out of your SIPP:

- You can take a tax-free lump sum of up to 25% of your SIPP subject to specific limits.
- The remaining fund value is used to pay an income which is subject to income tax. The income can be paid by either:
- Flexiaccess drawdown: you can receive an income directly from your SIPP, while the remaining funds continue to be invested. You can vary the level of income at any time, and there is no maximum amount. You can even take the whole amount out in

one go if you like. However, you should remember that the income will be taxed at your applicable rate, so if you withdraw a large sum, you may end up paying a higher rate of tax than usual. Please note that if you flexibly access your pension pot this triggers a restriction on future tax relievable contributions called the Money Purchase Annual Allowance.

- An annuity: your SIPP assets are sold and the monies are transferred to an insurance company of your choice, who will pay you a regular, taxable, income throughout your lifetime. There are several different types of annuity, each of which can be tailored to your personal requirements.

Apart from any tax-free lump sums that you take, with both the annuity and flexiaccess drawdown options you will be taxed under the Pay as you Earn ("PAYE") system. Where you receive a pension payment the tax has already been deducted, just like the way tax is paid on a salary.

If your SIPP has reduced to a small value, you may be able to withdraw the full remaining fund as a "Small Pot Lump Sum". 25% will be tax free and 75% will be subject to your applicable rate of income tax. Taking small pot payments does not trigger a restriction on future tax relievable contributions to your SIPP. If you have other small pension arrangements, you can take up to three small pots.

Where do you send my pension benefits?

Pension income is paid directly to your chosen bank account after any income tax deducted in accordance with the PAYE arrangements. Your bank account will need to be verified prior to the payment of benefits.

We will start paying benefits on receipt of the applicable forms and risk warnings, and when there is sufficient cash in the SIPP bank account. In the case of income payments, this must be 10 working days prior to the payment date.

We pay pensions on the 24th of the month by BACS which has a three-day clearance period unless this falls on a weekend whereby the payment will be made the first working day prior. For example, payment on Friday the 24th of a month will reach your bank account on Tuesday the 28th.

What happens if I am in "capped drawdown"?

If you had started to take payments from your pension prior to the 6th April 2015, your pension is called capped drawdown. This will mean that you are allowed to take income from your pension up to a certain limit each year. You are entitled to keep your pension as capped drawdown or if you wish to have more freedom, you can convert to flexiaccess drawdown meaning that there would be no capped income limit. However, this would trigger the Money Purchase Annual Allowance and reduce your maximum future pension contributions.

Is SIPP income subject to National Insurance?

No.

DEATH BENEFITS

What happens to my SIPP when I die?

When we are notified of your death by your personal representative, we will ask for a copy of your death certificate. We will check the entitlement and identity of any beneficiary named and then discuss options with them. Please note that Whitehall as the remaining trustee retains ultimate discretion over the distribution of your pension.

The options regarding any remaining funds are:

1. Beneficiaries take benefits as a lump sum.
2. Beneficiaries take benefits as income. Beneficiaries defer taking any benefits until a later date.
3. Beneficiaries can nominate successor beneficiaries to receive any remaining SIPP funds when they die.

We can set up a SIPP in the name of the beneficiary or transfer to a pension arrangement of their choice.

If you die before age 75 any lump sum or income will be paid tax-free provided it is designated to your beneficiary(ies) within two years of us being notified.

If you die after age 75 or benefits are designated after two years of death before age 75, any lump sum or income will be subject to income tax at each beneficiary's applicable rate.

If benefits are paid to a company or a trust then these may be subject to a tax charge.

If benefits are paid to a charity these are paid tax-free.

Please contact us or refer to our retirement and death benefits guidelines on our website for full details.

HM Revenue and Customs practice and the law relating to taxation are complex and subject to individual circumstances and changes which cannot be foreseen.

Can I transfer out of my SIPP?

Yes. You can close down your SIPP and transfer the assets to another Registered Pension Scheme subject to:

- All our fees being settled prior to transfer, and
- Investments being liquidated and transferred over as cash, where necessary, which may involve costs dependent upon the contract terms of those investments.
- You can transfer investments rather than cash to another pension scheme.
- If you want to transfer your SIPP fund to an overseas pension scheme there are additional rules.
- We always recommend you take advice from a qualified financial adviser before deciding whether to transfer-out.
- As mentioned above you may be able to withdraw your full SIPP fund as retirement benefits.

FEES

Where can I find out about the cost of my SIPP?

The SIPP fees are taken at outset and annually. We also charge fees for specific transactions. The SIPP fees are detailed in our current SIPP Fee Schedule which is available on our website. All fees are subject to VAT and may increase in the future. The SIPP fees are not based on the performance of the investment.

All fees are reviewed regularly and can be subject to change. Any changes to the SIPP fees will be announced at least 30 days prior to these changes coming into effect.

An invoice for SIPP fees due will be provided. If there are insufficient funds in your SIPP, alternative arrangements are required to settle the fees.

In respect of any pension advice received, your SIPP can facilitate adviser charges. If applicable, your advisor will be asked to invoice your SIPP and we will deduct their fees and ours from the SIPP bank account as per the bank mandate and these terms.

STRUCTURE

What are the rules that govern my SIPP?

The SIPP was established under a master trust deed and sets of rules, copies of which will be made available on request. Whitehall SIPP Trustees Limited is the scheme trustee and as such holds title to the SIPP's investments. Whitehall Group SIPP Limited conducts the day-to-day administration of the SIPP. Whitehall Group SIPP Limited is also responsible for collection of all fees due.

Who is the Operator of my SIPP?

The SIPP is provided by Whitehall Group SIPP Limited which is authorised by the Financial Conduct Authority ("**FCA**") to operate Self Invested Personal Pensions ("**SIPPs**").

Who is the Trustee of my SIPP?

Whitehall SIPP Trustees Limited is the scheme Trustee. You are also a trustee of your SIPP.

How are my investments registered?

Your investments will be registered in the names of yourself and Whitehall SIPP Trustees Limited as the trustees of your Whitehall SIPP.

How will payments be received by and made from my SIPP?

We maintain a pooled bank account for your SIPP which will be controlled by Whitehall SIPP Trustees Limited. This account is held by the SIPP trust and is not a company asset. It is protected by the Financial Services Compensation Scheme (FSCS). Any payments from the SIPP bank account must be authorised by you in your capacity as a trustee.

OTHER INFORMATION

How can I contact you?

Your adviser will normally be your first point of contact. If you have any questions or would like to make any changes to your plan you can phone, email or write to us:

Telephone: 03302 232300 Monday to Friday, 09:00-17:00 (Please have your SIPP number ready when calling).

Email: sipp@whitehallgroup.co.uk

Correspondence address: Whitehall Group, 8-10 Bolton Street, Ramsbottom, BL0 9HX.

What should I do if I have a complaint?

If you have a complaint about your SIPP, please contact us in writing, by email, or telephone using the contact details shown above. You can make a complaint yourself, or someone else can do it on your behalf as long as you have given them written authority to do so.

If you are not satisfied with our response to your complaint, you can contact the Financial Ombudsman Service by writing to: The Financial Ombudsman Service, Exchange Tower, Harbour Exchange, London E14 9SR, or by calling 0300 1239123, or by sending an email to complaintinfo@financialombudsman.org.uk.

Alternatively, if your complaint was in respect of the administration of your SIPP you can complain to the Pensions Ombudsman either in writing: The Pensions Ombudsman, 10 South Colonnade, Canary Wharf, London, E144PU or by calling 0800 917 4487.

Vulnerability

We can all become vulnerable at any time and there are many forms of vulnerability.

If you already have a vulnerability or you become vulnerable and need some support, please contact us in writing, by email, or telephone using the contact details shown above.

Law

The law of England and Wales will govern any dispute in relation to the scheme. The information contained in this document is provided based on our understanding of current law, the practice of HM Revenue & Customs, and the practice and guidance of the Financial Conduct Authority ("FCA").

English trust law applies to the operation of the SIPP. All trustees are required to act in good faith, to carefully follow the rules of the SIPP and all applicable law.

You may wish to take advice on the application of trust law to your SIPP and the duties applicable to you as trustee.

Compensation

The Financial Services Compensation Scheme (FSCS) has been set up to provide protection to consumers if authorised financial services firms are unable, or are likely to be unable, to meet claims against them.

Different limits apply to different types of investment. In some circumstances, you might not be eligible for any compensation under the FSCS. For example, direct ownership of commercial property is not protected by the FSCS which is why we insist on insurance being in place.

In respect of investments, you may be eligible for:

- Compensation under the FSCS up to £85,000 per investment provider.
- Deposits: an eligible depositor is entitled to claim up to £85,000. This limit relates to the combined amount in all the eligible depositor's accounts with the bank, including their share of any joint account, and not to each separate account. More details are available from the FSCS website: www.fscs.org.uk, or you can call them on 0800 678 1100.

5. Glossary

Annual Allowance

The maximum amount that can be paid to your pension arrangements each tax year (ending 5th April).

Annuity

Payment of a pension from an insurance company.

Benefit Crystallisation

The point where you commence drawing retirement benefits.

Capped Drawdown

Pension payment from your SIPP that commenced before 6th April 2015.

Contributions

Payment of money into your SIPP (not investment income).

Financial Adviser

An adviser who is authorised and regulated by the Financial Conduct Authority.

Financial Conduct Authority (FCA)

The Government organisation that regulates financial advice, personal pensions and investments.

Financial Services Compensation Scheme (FSCS)

The Government organisation that provides compensation where regulated businesses fail.

HM Revenue & Customs (HMRC)

The Government organisation that handles tax collection.

Pay As You Earn (PAYE)

The process of deducting and paying income tax from your earnings.

SIPP

Self-Invested Personal Pension – this pension plan.

Tax-Free Lump Sum

Where part of your SIPP fund can be paid as a lump sum which is tax-free.

Transfers

Moving your pension money from one pension scheme to another.

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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.



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