



WHITEHALL

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SSAS Non-standard Investment Instruction

1. Notes

1. **Non-standard investments are considered high-risk and unsuitable for those who are not certified as a High Net Worth Individual or Sophisticated Investor. Please read the FCA Invest Smart information on high-risk investments at www.fca.org.uk/investsmart/5-questions-ask-you-invest**
2. A non-standard investment is defined by us and is one which is marketed for general investment but is not regulated by the Financial Conduct Authority and does not have protection from the Financial Services Compensation Scheme. Non-standard investments typically cannot be readily valued or realised within 30 days.
2. Please refer to the FAQs at the end of this document for useful information on completing the form. If you have any further questions about the form, please contact us at enquiries@whitehallgroup.co.uk or telephone 03302 232300.
3. It is important that you understand your pension scheme is defined by HM Revenue & Customs (HMRC) as a "Member Directed Pension Scheme" where the decisions to invest are made by the member trustees. The role of Whitehall Trustees Limited is to jointly hold assets and take instructions on investments. Whitehall Trustees Limited does not give financial advice on the suitability of investments and does not monitor the ongoing suitability of investments. We will carry out background checks to help try and establish that investments will not incur tax charges from HMRC and there are no existing signs of a scam but ultimately the decision to invest and continue investing is being made by the member trustees.
4. Under the scheme rules investment decisions must be made unanimously by the member trustees. This form should be completed and signed by all member trustees to demonstrate unanimous decision making.
5. Under legislation the member trustees have a duty to take proper advice (regulated financial advice, legal advice, accountancy advice and/or tax advice) on investments and consider diversification and appropriateness of investments.
6. Member trustees have a duty to act prudently, responsibly, and honestly.
7. Member trustees must also act impartially and in the best interest of the scheme beneficiaries. Member trustees must therefore identify any conflicts of interest they may have when making investment decisions.
8. Beware of pension scams. Falling foul of a scam could mean you lose some or all your retirement money. Find out how pension scams work, how to avoid them and what to do if you suspect a scam by visiting <https://www.thepensionsregulator.gov.uk/en/pension-scams> and <https://www.fca.org.uk/scamsmart>

2. Pension Scheme Name

Name of SSAS

3. Investment Details

Investment Name

Investment Provider

FCA reference, if relevant

Note: Enter 'N/A' if not FCA regulated

Underlying assets being acquired by the investment

Note: e.g. peer to peer lending, cryptocurrency etc

Investment term

Note: Term in years/ months

Investment liquidity

Liquid Illiquid

Investment risk level

Low risk Medium High Risk

Amount to be invested (£)

Percent of SSAS to be invested (%)

Charges, fees, commissions and all associated payments to be made in connection with the investment.

Note: if you are unaware of all related costs, we may be unable to proceed

4. Advice

Professional advice being taken (Section 36 of the Pensions Act 1995 requires trustees to obtain advice before making investments):

Type	Company/Individual Adviser Name	Regulated Reference	Date of Advice	Copy Enclosed	Note: Advice should be addressed to the trustees
<input type="checkbox"/> Financial	<input type="text"/>	<input type="text"/>	<input type="text"/>	Yes <input type="checkbox"/>	
<input type="checkbox"/> Legal	<input type="text"/>	<input type="text"/>	<input type="text"/>	Yes <input type="checkbox"/>	
<input type="checkbox"/> Accountancy	<input type="text"/>	<input type="text"/>	<input type="text"/>	Yes <input type="checkbox"/>	
<input type="checkbox"/> Tax advice	<input type="text"/>	<input type="text"/>	<input type="text"/>	Yes <input type="checkbox"/>	
<input type="checkbox"/> Property	<input type="text"/>	<input type="text"/>	<input type="text"/>	Yes <input type="checkbox"/>	
<input type="checkbox"/> Other	<input type="text"/>	<input type="text"/>	<input type="text"/>	Yes <input type="checkbox"/>	

If you are not taking advice, please explain why you have chosen not to, against the requirements in the Pensions Act 1995.

Details of member trustees' own knowledge and years of experience of investing in this investment asset type.

What background checks have the member trustees and/or advisers carried out before deciding to invest?

5. Promotion

How did you hear about this investment?

Have the risks of this investment been clearly explained to you?

Yes No

Have you been offered any incentives to invest? If so, what?

Are there any guarantees associated with this investment? If so, what?

Have you been taken through a client categorisation and appropriateness process by the investment provider?

Yes No

Note: An investment provider can only promote high risk investments to High-Net-Worth Individuals or Sophisticated Investors

6. Appropriateness and diversification

Member Name

Current occupation (previous, if retired)

Current age

How many years until you intend to retire/draw benefits?

Will the investment prevent you from accessing your current/intended retirement benefits?

Yes No Yes No

Is the investment within your risk tolerance?

Yes No Yes No

Is the investment within your capacity for loss?

Yes No Yes No

Are you a High Net Worth Individual
If yes, complete separate declaration found at the end of this form

Yes No Yes No

Are you a Sophisticated Investor?
If yes, complete separate declaration found at the end of this form

Yes No Yes No

Note: please complete separate sheet if more than 2 members

Note: See definitions in the certificates at the end of this form.

Percent of overall pension savings represented by this investment (%)

Percent of overall net wealth represented by this investment (%)

How do you feel your pension funds are suitably diversified by making this investment

Detail any conflicts of interest that need to be documented

Note: the FCA recommends no more than 10% in high-risk investments. If above this level, please provide more reasoning.

7. Declarations

1. I/We understand all of our trustee duties on investment decisions as set out in the notes above and detailed under the scheme rules, legislation and The Pension Regulator guidance.
2. I/We accept that Whitehall Group (UK) Limited and Whitehall Trustees Limited have provided no advice in relation to this investment and its suitability. I/We confirm we have taken and considered proper advice in accordance with Section 36 of the Pensions Act 1995.
3. I/We understand that Whitehall Trustees Limited does not bear any responsibility for investment decisions which are all made by the trustees who are members.
4. I/We understand and agree that I/we are fully aware of the nature and risk of making the investment instructed, that it may be high risk and I/we may lose most or even all the funds invested.
5. I/We are fully aware that there may be problems in realising any illiquid investment, should the need arise in paying retirement and/or death benefits.
6. I/We understand that the investment is not regulated by the Financial Conduct Authority it has no protection from the Financial Services Compensation Scheme should the investment fail.
7. I/We confirm that the information provided in this questionnaire is true and accurate and can be used by you for the purposes of the proposed investment to be made by a registered pension scheme.
8. I/We accept and agree that the information may be shared with HM Revenue & Customs and/or the Pensions Regulator.
9. I/We agree to the payment of administration fees to Whitehall Group (UK) Limited in relation to this investment at the rate in their most recent fee schedule published on their website. I/We understand that this schedule can be amended from time to time.
10. I/We confirm that the investment does not involve any activity that could be construed by HM Revenue & Customs as being for the purpose of pension liberation and there are no aspects of the activity that could conflict with the investment being held by a UK Registered Pension Scheme.
11. I/We recognise that this investment is being made in accordance with our powers under the trust documentation of the pension scheme.
12. I/We acknowledge that the sole purpose of a pension scheme is to accumulate retirement savings and I/we believe that this investment represents a sound investment for the pension fund with this objective in mind.
13. Where Whitehall Group (UK) Limited and/or Whitehall Trustees Limited have carried out due diligence checks on the above investment I/we agree to and understand the following:
 - The due diligence has been carried out purely to establish whether, in the opinion of Whitehall Group (UK) Limited and Whitehall Trustees Limited, the investment is genuine and will not be treated as "taxable property" as defined by HMRC. Whitehall Group (UK) Limited and Whitehall Trustees Limited cannot give any guarantees or assurances that there are no aspects of the investment that could conflict with the investment being held by a UK Registered Pension Scheme.
 - These checks are only carried out at outset and ongoing due diligence checks are not made as a matter of course. Whitehall Group (UK) Limited and Whitehall Trustees Limited cannot therefore give any assurances regarding the behaviour of the investment company(ies) from this point onwards.
 - Whitehall Trustees Ltd will arrange the investment on your above instruction acting either with or without advice from another party on the basis that you recognise the investment

is being made in accordance with your powers under the trust documentation of the pension scheme.

- Whitehall Group (UK) Ltd and Whitehall Trustees Ltd cannot give any comment on the likely performance of the investment or its legal structure as we are not investment advisers.
- Whitehall Group (UK) Ltd and Whitehall Trustees Ltd cannot give any comment on the validity of any guarantees, charges or promised income or returns as we do not give legal advice.
- If the investment involves Discretionary Management, Whitehall Group (UK) Ltd and Whitehall Trustees Ltd cannot comment on the investment strategy.
- Background checks have been made by Whitehall Group (UK) Ltd and Whitehall Trustees Ltd based on the information provided in our questionnaire and the accompanying items supplied. These have been carried out in good faith but additional checks to establish whether the information provided is true and accurate have not been made.
- I/we have carried out our own due diligence checks to establish that I/we wish to proceed with the investment instructed above and I/we are not relying on the checks carried out by Whitehall Group (UK) Limited and Whitehall Trustees Limited.

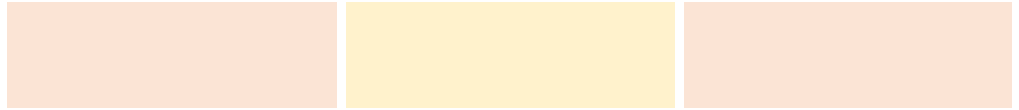
14. I/We agree to the following indemnities and limitation of liability:

- Neither the Whitehall Group (UK) Limited nor Whitehall Trustees Limited or any subsidiary or associated companies will be liable for any unauthorised payment charge, unauthorised payment surcharge, scheme sanction charge, claims, costs, actions or demands or other tax charge or penalty imposed by HM Revenue and Customs in connection with this investment.
- In addition to any indemnities conferred on them by law or under the trust documentation, Whitehall Group (UK) Limited and Whitehall Trustees Limited are not liable for any act or omission (including the act of delegation or sub-delegation) of the member trustees or their advisers or their delegates or sub-delegate in relation to the exercise of powers under the trust documentation of the scheme.
- Whitehall Group (UK) Limited and Whitehall Trustees Limited are indemnified against any claims, costs, actions or demands in relation to the exercise of the delegated powers and duties to the member trustees.
- The liability of Whitehall Group (UK) Limited and Whitehall Trustees Limited or any subsidiary or associated companies in connection with this investment shall at all times be limited to the value of the assets held within the above-named pension scheme.

8. Signature

	Name	Signature	Date
Member Trustee			
Member Trustee			
Member Trustee			
Member Trustee			
Member Trustee			

Member Trustee



Please return this form to:

Whitehall Group
8-10 Bolton Street
Ramsbottom
BL0 9HX

Contact Us:

Telephone: 03302 232300

Email: enquiries@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, BL0 9HX.

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

High-Net-Worth Investor Statement

Please confirm whether you qualify as a high-net-worth investor on the basis that A or B apply to you.

In the last financial year did you have:

- A. An annual income of £100,000 or more? Income does NOT include any one-off pension withdrawals.

Yes

No

If yes, please specify your income (as defined above) to the nearest £10,000 in the last financial year

- B. Net assets of £250,000 or more? Net assets do NOT include: your home (primary residence), your pension (or any pension withdrawals) or any rights under qualifying contracts of insurance.

Yes

No

If yes, please specify your net assets (as defined above) to the nearest £100,000 in the last financial year

- C. None of these apply to me

Yes

1. I accept that being a high-net-worth investor will expose me to promotions for investment where this is a significant risk of losing all the money I invest.
2. I am aware that it is open to me to seek professional advice before making any investment in a high-risk investment.

Name

Signature

Date

Self-Certified Sophisticated Investor Statement

Please confirm whether you qualify as a self-certified sophisticated investor on the basis that A, B, C or D apply to you.

In the last two years have you:

- A. Worked in private equity or in the provision of finance for small and medium enterprises?

Yes

No

If yes, what is/was the name of the business or organisation?

- B. Been the director of a company with an annual turnover of at least £1 million?

Yes

No

If yes, what is/was the name of the company?

- C. Made two or more investments in an unlisted company?

Yes

No

If yes, how many investments in unlisted companies have you made in the last two years?

- D. Been a member of a network or syndicate of business angels for more than six months?

Yes

No

If yes, what is the name of the network or syndicate?

- E. None of these apply to me

Yes

1. I accept that being a self-certified sophisticated investor will expose me to promotions for investment where this is a significant risk of losing all the money I invest.
2. I am aware that it is open to me to seek professional advice before making any investment in a high-risk investment.

Name

Signature

Date



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Frequently Asked Questions

1. This is a member-directed pension scheme, why do the member trustees need to complete this form?

Investment decisions are still with the member trustees, and Whitehall Group (UK) Limited does not give financial advice. Recent Pension Ombudsman guidance has changed the need for trustees to document the process undertaken when making investment decisions. Regulation requires the trustees have considered the suitability and diversification of investments in line with the personal circumstances of the members and considered the need for proper advice. The form is simply to document these considerations have been made in line with trustee duties.

2. What is the investment liquidity?

Liquidity levels refer to how easily an investment can be converted to cash for benefit payments or other pension scheme needs. Cash-based investments are the most liquid, while those with longer terms or no ready market (like unquoted shares) are the least liquid. The liquidity level affects investment suitability and should be considered alongside the scheme's overall liquidity, diversification, and the timeline for beneficiary withdrawals.

3. What is the investment risk level?

Risk levels indicate the potential for losing invested money and the ability to access funds if needed. High-risk investments include unsecured loans, unquoted shares, and crypto assets, while cash-based investments are low risk. Trustees should identify high-risk investments and consider them against a beneficiary's capacity for loss, risk tolerance, investment knowledge, and overall financial diversification. High-risk investments are unsuitable if a loss would affect the beneficiary's financial stability in retirement.

4. What is meant by suitably diversified?

Regulations require the trustees consider diversification and thoughts are documented, however it is appreciated suitable diversification is subjective and based on personal circumstances. Diversification takes into account not just asset classes but, underlying industries/sectors, risk levels and liquidity. Please see the FCA guidance on investment diversification at www.fca.org.uk/investsmart/diversification

5. What is a conflict of interest that needs to be documented?

Trustees have a duty to act impartially and in the best interest of the pension scheme beneficiaries. If other interests, such as acting for the employer or any personal interests, would influence a trustee to not act in the best interest of the scheme, these need to be identified, disclosed, and managed.