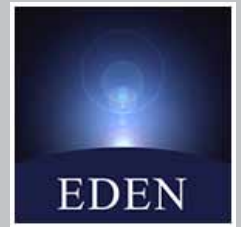


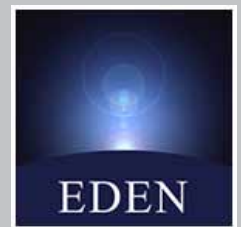
# CLIENT SERVICE CHARTER

Peter V Noble  
*November 2010*

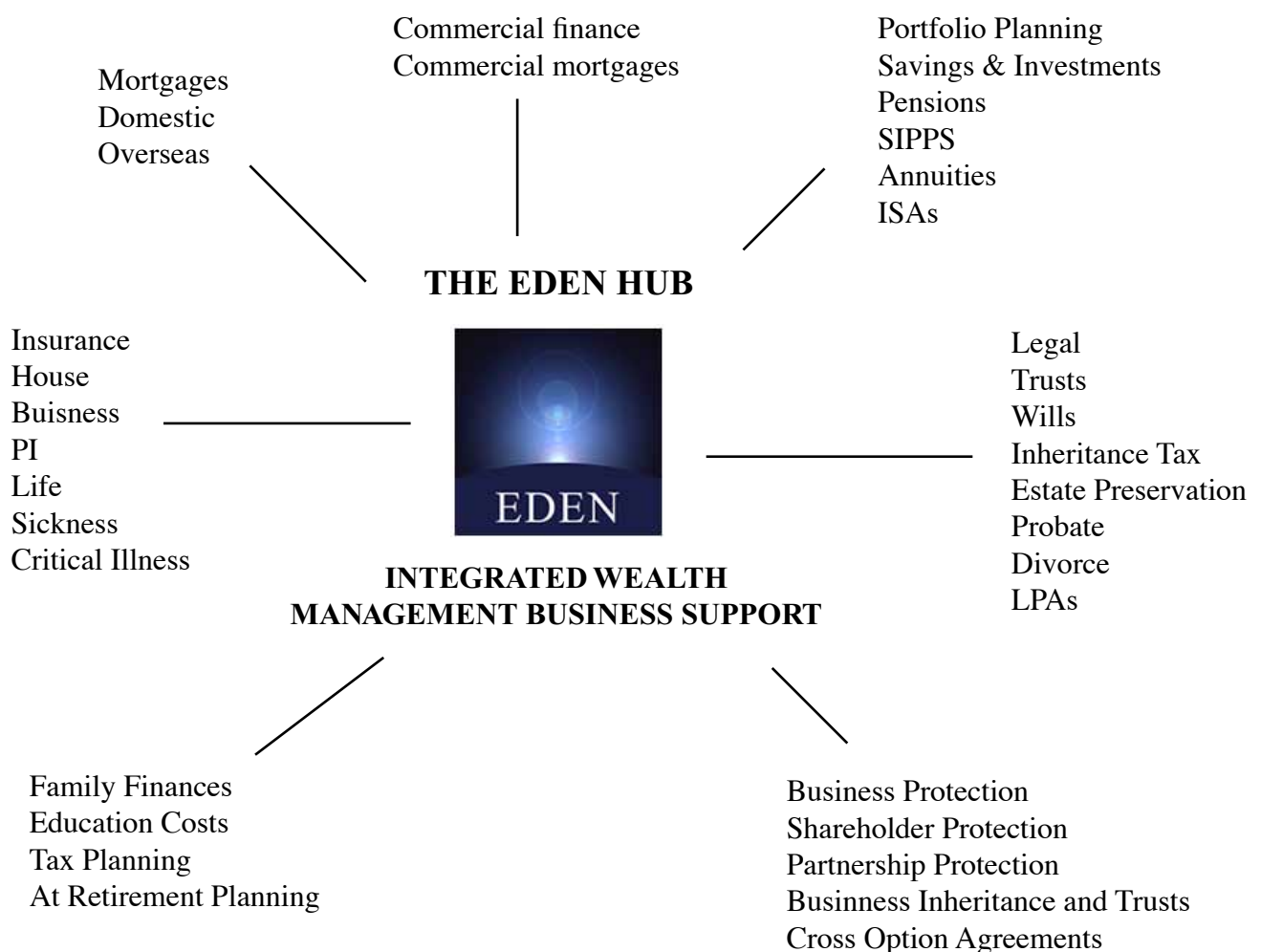


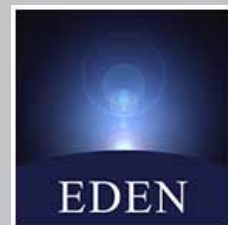
“It’s not about the vast array of products that we have available. It’s about the relationship we build with our clients, built on transparency and trust, and our desire to work in partnership with them through their lifetime, taking account of their changing circumstances, whether business or domestic.”

**...Neil Brown, IFA**



# Integrated Wealth Management





# Eden's Services

We provide you with financial planning and bespoke financial services. The key objectives are to provide you with general financial advice, mortgage and protection advice, retirement planning, investment management, taxation advice and estate planning, with the goal of sustaining and growing your long-term wealth.

- Portfolio structuring and restructuring
- Savings and investments
- Retirement planning, wills and trusts
- Inheritance tax planning
- Mortgages, residential, commercial, buy to let, overseas, commercial finance
- Business and shareholder protection
- General insurances

We have access to the whole market. We do not work for a panel of lenders or providers.

## Our history and philosophy

We started providing independent financial advice as Eden in 2007. However, Neil Brown, our principal advisor, has been providing financial advice since 1997 and worked in the banking industry for thirteen years prior to that.

In early 2010 Neil identified a need to introduce a fully integrated wealth management service. To assist him in developing the business, he invited Alastair Brooks, a solicitor, and Peter Noble, an accountant, to join the Eden team in February 2010.

At Eden we attribute our success to three cornerstones around which all aspects of our integrated wealth management service are based. By focusing on these three values, we strive to deliver the highest levels of service to all our clients.

### Independence

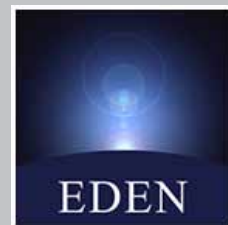
Our approach to investment management is founded upon independence of advice and thought. Because of this we can select investments on a best-of-breed, conflict-free basis.

### Client focused

Providing you with the highest level of service is at the heart of our business and we focus on tailoring a financial plan that reflects your own particular needs. We offer old fashioned values enhanced by modern day techniques.

### Forward thinking

While our service is based around traditional values, we only recommend forward thinking portfolio managers, plus the best possible support service providers. We gear our integrated wealth management service to protect every element of your wealth over your lifetime.



# Retail distribution review

The retail distribution review (RDR) is set, by 2012, to change the way companies like ours are paid for providing you with advice. Currently, advisor remuneration tends to be determined by product providers who pay an advisor a set level of commission on each product. Post-RDR advisors will agree directly with clients an appropriate charge for their advice rather than receiving a commission from the product provider.

## Treating customers fairly

Treating customers fairly (TCF) places the onus on advisors to demonstrate they are providing clients with a level of ongoing service that justifies the revenue received from them. TCF also requires an advisor to ensure you understand the risks and limitations of a product as well as its benefits.

We set out to ensure that our approach to you meets both your needs and those of the various regulatory authorities as we move through the next few years of change in the industry.

# Our investment review process

We operate a robust and scientific investment process to help you achieve your long-term financial goals. Our integrated wealth management system offers a planning process unlike anything you are likely to have experienced before.

At our first meeting we will explain our review process and ask you for the information that will help us to prepare for a second meeting. At this second meeting we will create financial models that clearly and concisely illustrate your current situation and the projected future growth of your assets. This model will form the basis of all future reviews.

## Learning about you

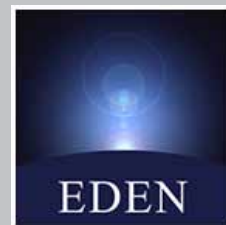
Taking the time to fully understand your needs both now and in the future allows us to construct a clear financial strategy. As a first step, we learn all we can about your present financial position and the savings and investments you already hold. With your assistance, we will gather all the necessary paperwork that will allow us to determine your current position and the existing planning you have in place. This would include your most recent investment statements, life insurance policies, will/s, trusts and any other relevant documents, including any business-related ones.

## Determining your objectives

Understanding your needs today and your plans for the future, plus your attitude to risk, are crucial to the planning process. Whatever your goals, the sooner you start planning towards them, the more achievable they are likely to become.

We will discuss your immediate and future financial objectives. Then we look at your present and future income sources and expenditures and determine whether your wealth or income is consistent with your aspirations.

We will fully analyse and evaluate your personal situation, taking into account lifetime issues such as protecting against capital loss, your time horizon, maintaining control over your assets and your need for income in retirement. Although it's not something any of us want to think about, an integral part of the process is to discuss your wishes for the distribution of your estate on death, so that we can look at solutions for the tax-efficient transfer of your assets to your heirs. At the same time we will seek to protect these assets on divorce, bankruptcy or other events.



## Assessing your attitude to risk

A key element of the planning process is to objectively determine your attitude to risk. We utilise a risk profiling tool that involves asking you a number of psychometric questions. If appropriate, we will ask your partner the same set of questions as they may have a different attitude to risk. The key areas the questions will cover include:

- Preference for capital preservation versus riskier investment gains
- Desire for profit
- Preference for the short-term versus the long-term
- Financial awareness
- Financial experience
- Age
- Domestic circumstances

Your responses are fed into the modelling tool and your resulting risk profile is usually represented as a number from 1-10 where 1 is a risk-averse client and 10 is a risk-taker. The higher the risk profile, the more you are willing to accept a good amount of short-term fluctuation in the value of your investments in return for the expectation of higher returns in the long-term. We will discuss this profile with you to ensure you agree with the level of risk you are prepared, or need, to accept with your money in order to achieve your financial goals.

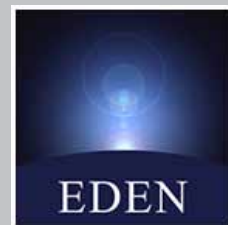
## Constructing your portfolio

Once we have a full picture of your current needs, plus your future goals and time horizon, we will construct a financial 'road map'. This will allow us to identify any shortfalls between where your portfolio is currently positioned in terms of its risk and likelihood of achieving your objectives and what you need to meet your future goals. We will then recommend either a rebalancing of your existing portfolio or a new spread of funds that, with your agreement, will be implemented with a view to reconciling any shortfalls and maximising the likelihood of you reaching your goals as tax-efficiently as possible.

## Updates and reviews

Your financial 'road map' is not cast in stone and will need regular review. Pension rights change, new tax laws are implemented, health can become a factor and your needs and goals for the future may alter over time. That's why we will sit down with you regularly to review your strategy and ensure it's still meeting your needs.

You can choose from a number of ongoing service levels that include regular review meetings.



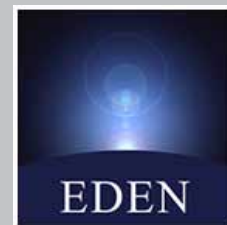
# Fees and ongoing service levels

We aim to be transparent with our fees and guarantee that there will be no hidden charges. You, as the client, are in control of the costs and we therefore need to seek your agreement before any costs are incurred.

As we believe it's important that you pay only for the level of service you would like to receive, we offer three service levels that you can select from. The larger your investment value, the more often it should be reviewed so, for example, we would recommend that if the value of your portfolio is over £500,000 you would be better to opt for our wealth optimisation service. However, you are completely free to choose the service level you prefer.

In each of the following 3 example client profiles, we will add value to your portfolio through the activities of asset allocation, tactical overlay, fund selection and monitoring, fund rebalancing and ensuring that any changes comply with your risk profile.

Further, whilst the 3 profiles suggest quarterly, half-yearly or annual reviews, there is nothing to prevent any client having as many reviews as they deem appropriate for them as each review meeting is charged at the same rate as indicated below.



# Wealth optimisation

## Clients with portfolios of £500K plus

- Quarterly reviews with chosen fund manager(s) and Neil Brown
- 24/7 access to investments either via the fund direct or via Eden on-line
- 5 days a week telephone contact with Neil Brown to resolve any investment concerns or queries

The initial fee for full restructuring and implementation will be determined and agreed at the outset and will depend on the complexity of the existing arrangements and their tax wrappers. After initial implementation all future amendments to the contracts and or investment houses will be included in the annual fee which typically will be up to 1% of investments annually, with a maximum cap of £2,500. However, there may be instances when an amendment cannot be carried out within our annual fee, in which case we will notify you of any additional fee at the time.

Typically, the fund managers we recommend at the optimisation level of investment might include active and/or passive fund managers. We will also involve tax specialists as necessary and finally involve any wrap providers, who will be continually monitored for their performance. Tax specialists and wrap providers will often have their own charges. You will be advised of such charges before any such work is commenced.

# Wealth development

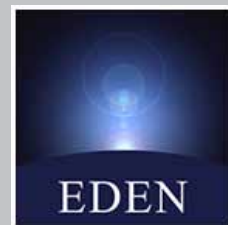
## Clients with portfolios between £100K and £500K

- Six-monthly reviews with fund manager(s) and Neil Brown
- 24/7 access to investments either via the fund direct or via Eden on-line
- 5 days a week telephone contact with Neil Brown to resolve any investment concerns or queries

The initial fee for full restructuring and implementation will be determined and agreed at the outset and will depend on the complexity of the existing arrangements and their tax wrappers. After initial implementation all future amendments to fund and investment houses will be included in the annual fee which typically will be up to 1% of investments annually, with a maximum cap of £2,500. However, there may be instances when an amendment cannot be carried out within our annual fee, in which case we will notify you of any additional fee at the time.

Typically, the fund managers we recommend at the development level of investment might include active and/or passive fund managers. We will also involve tax specialists as necessary and finally involve any wrap providers, who will continually be monitored for their performance. Tax specialists and wrap providers will often have their own charges. You will be advised of such charges before any such work is commenced.

At both the optimisation and development levels of investment we recommend that clients meet suggested fund managers as part of the initial process as chemistry can be a vital part of the overall comfort zone a client needs.



# Wealth creation

## Typically clients with smaller or start-up portfolios

- Annual reviews with Neil Brown
- Eden on-line fund access

Typically, this will include a multi manager approach and the creation of the respective tax wrappers.

The initial fee for full structuring and implementation will be determined and agreed at the outset and will depend on the complexity of the arrangements and their tax wrappers. After initial implementation all future amendments to funds will be included in the annual fee up to 1% of the fund. Any additional creation of tax structures and amendment of any wrappers will be looked at independently and you will be advised of any additional charges.

# Discretionary fund managers

Discretionary fund managers will make a fund-based charge for their service. These charges will be advised to you at the initial consultation with the investment manager.

We will recommend a fund manager or a mix of fund managers appropriate to your investments. We use DFMs for their expertise in analysing the multiplicity of funds out there as for example a portfolio of 20 funds may have 200 equity shareholdings within them. DFMs use international research firms to analyse the global investment markets to create well structured, balanced and independent investment portfolios with regular rebalancing of the portfolio as markets change.

# Valuation of assets

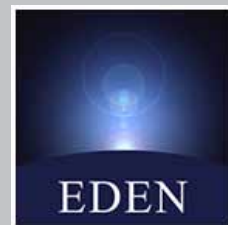
You will have 24/7 access via our 'client web portal' to all of your assets held in your Eden portfolio. Your portfolio, whilst accessible by you as described, will also be constantly monitored by our paraplanner who will ensure that Neil Brown is appraised of any risk to your investments brought about by changes in the marketplace.

The role of the paraplanner is to ensure that we meet our service criteria as laid down in this charter. The planner will book review meetings, prepare portfolio performance reviews and prepare your reports with recommendations for the review meeting between Neil Brown and yourself.

You will receive a bi-monthly newsletter providing information on new products in the marketplace, changes in tax rules, changes in pension rules and any other pertinent information that could affect your wealth.

Whilst wealth management is all about growing and sustaining long-term wealth, protection plans such as income protection, life assurance and critical illness assurance should not be overlooked. Business owners should also give consideration to Key Person cover and shareholder protection.

Protection does not necessarily mean simply taking out appropriate insurance as configuring pensions and investments in the correct way can provide a valuable spousal benefit or protection against inheritance tax or nursing care costs. In many circumstances life assurance should be written in trust. We will review the appropriateness of trusts with you.

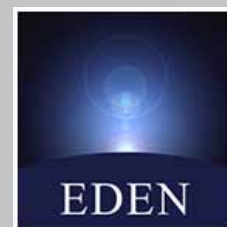


# Associated services

In our endeavours to ensure total transparency in our client service proposition, we inform you that when certain products and services are referred to specialist advisors we may receive a referral fee from the service or product provider. Usually you are billed direct by the service or product provider. Such services might be:

- Retirement planning, wills and trusts
- Inheritance tax planning
- Business and shareholder protection
- Residential and commercial mortgages
- General insurances

By 2013, we aim to provide our clients with an advance fee guide for all the above services along with the referral fee repayable to us.



## Conclusion

We, by way of this service proposition, endeavour to provide you, our client, with a clear picture of the changes the financial services industry wishes to impose upon us in respect of fees as from the end of 2012 and what services you can expect for these fees.

### **The areas subject to change are:**

- Investment bonds, both on and offshore, unit trusts, ISAs and regular savings
- All pension contracts, including Personal, Stakeholder, SIPP and annuities.

In other words, all investment contracts. As far as we are aware at the moment all other services provided through us will remain commission-based as at present.

We reiterate: our success can be attributed to the three cornerstones around which all aspects of our integrated wealth management proposition have been based. By focusing on these three values, we strive to deliver the highest levels of service to all our clients.

## Independence

Our approach to investment management is founded upon independence of advice and thought. Thanks to our independence we are able to select investments on a best-of-breed, conflict-free basis. This particular value enables us to offer multi-manager and multi-asset investing on your behalf.

## Client focused

The service delivered to each of our clients is at the heart of everything we do. Thanks to our business model being built around our clients, we understand the need to deliver the highest level of customer service. Old fashioned values enhanced by modern day techniques.

## Forward thinking

Whilst the service offered by us is based around traditional values, we only recommend forward thinking portfolio managers as well as the best support service providers that exist today, constantly monitored for their currency in an ever-changing financial environment. Our integrated wealth management service is geared towards protecting every element of your wealth for your lifetime.

YOUR HOME MAY BE REPOSSESSED IF YOU DO NOT KEEP UP REPAYMENTS ON YOUR MORTGAGE.  
BUY TO LETS AND COMMERCIAL MORTGAGES ARE NOT REGULATED BY THE FSA.  
THE VALUE OF INVESTMENTS CAN GO DOWN AS WELL AS UP.  
CHANGES IN THE EXCHANGE RATE MAY INCREASE THE STERLING EQUIVALENT OF YOUR DEBT.

**Neil Brown**, IFA, Eden Financial and Wealth Management