

# Bespoke Investment Management

## Fair Value Assessment

<b>Product Overview</b>	<b>Product Type / Group</b>	<b>Discretionary Investment Management</b>
	<b>Product Name</b>	<b>Bespoke Investment Management</b>
	<b>Product description</b>	<p>The Bespoke Investment Management service is intended for clients with £1m+ of AUM (although lower AUM can be accommodated) who require a discretionary portfolio service, potentially with a personal relationship with their Investment Manager, who can have suitability as well as portfolio management responsibility.</p> <p>The service is provided by over 85 Bespoke Investment Managers (BIMs), spread across 9 teams and offices, supported by dedicated desk based staff and Close Brothers Asset Management's (CBAM) wider Investment team resource.</p>

<b>Target Market</b>	<b>Product target market information</b>	<b>Positive</b>	<b>Negative</b>
		<ul style="list-style-type: none"> <li>▪ The service is suitable for General Investment Account, ISA, SIPP, Offshore Bond/Delegation Bond mandates.</li> <li>▪ CBAM can also offer Offshore based portfolios, for non-resident clients who wish to keep their assets outside of the UK. Such portfolios are held in custody with BNP Paribas in Jersey and are therefore separate from the UK based ones.</li> <li>▪ The service is targeted at customers typically with between £500k and £25m of investable liquid assets where they want to build a strong and trusted relationship with an individual BIM either directly or via a Financial Planner or IFA.</li> <li>▪ Clients typically have investments across multiple tax wrappers and mandates. They also may include inter-related family members with specific and individual constraints or requirements.</li> <li>▪ Clients may wish to have portfolios including direct stocks rather than solely collective instruments.</li> <li>▪ Clients do not have any specific knowledge or experience requirements since the service offered is discretionary investment management with a qualified and competent BIM servicing their needs.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Clients must be willing and able to tolerate short and long term loss of capital in order to invest.</li> <li>▪ Clients must have investable assets sufficient to create an appropriate portfolio; normally defined as £1million+ but can be lower at BIM discretion.</li> <li>▪ High risk residence and domicile may be declined.</li> </ul>
	<b>Good outcomes provided by the product for clients in the target market</b>	The client is able to realise all the appropriate benefits of the services provided to support them in meeting their financial objectives. Clients with characteristics of vulnerability are appropriately identified and are not disadvantaged when compared to ordinary retail clients. Their support is tailored to support them in realising their financial objectives.	
<b>Foreseeable harms and means of mitigation by manufacturer and distributor</b>	<b>Foreseeable risks or harms</b>	<b>Mitigation</b>	
	<ol style="list-style-type: none"> <li>1. Small clients overpaying for service they don't need where their needs could be better provided through an alternative investment solution such as a fund.</li> <li>2. The client could be a non UK resident leading to tax or legal implications.</li> <li>3. Risk of investment loss.</li> </ol>	<ol style="list-style-type: none"> <li>1. CBAM will consider the nature of the service being provided and each client's unique circumstances. Prices will be set accordingly to ensure fair value, with appropriate oversight from senior management and within agreed parameters.</li> <li>2. This is mitigated through the firms overseas client policy and controls.</li> <li>3. Clear communication either directly with the client or through the adviser (where applicable) to ensure the client understands the level of risk being taken and has the appropriate capacity for loss.</li> </ol>	

Benefits and Limitations	Details of how the product benefits and limitations may impact clients	Benefits	Limitations
		<p>Bespoke Investment Management provides an individual investment management service to individuals, trusts, families, corporates and charities with an asset allocation and security selection based on meeting individual client objectives and priorities.</p> <p>Full tailoring of portfolios is available to meet client needs, preferences and objectives ranging from income needs to company or sector exclusions based on ethical stances.</p> <p>Engagement with BIMs is available to all clients ensuring that investment needs and objectives are taken into account when constructing the investment portfolio; initial and ongoing suitability is assessed either by the regulated intermediary or the BIM to ensure that the service is and remains suitable for the client.</p> <p><b>Non-financial benefits include:</b></p> <ul style="list-style-type: none"> <li>▪ Full client reporting including tax reporting designed to allow easy transference to a UK tax return</li> <li>▪ Access to an online client portal and app with 24/7 access available (outside of announced maintenance times)</li> <li>▪ Access to BIM and support staff whenever needed including a minimum of biennial suitability assessment</li> <li>▪ Facility for BIM to liaise with other professional connections where appropriate and authorised by the client</li> <li>▪ Access to Close SIPP (provided under advice), ISA &amp; JISA is available where appropriate.</li> </ul>	<p>Bespoke Investment Management provides an individual investment management service to individuals, trusts, families, corporates and charities with an asset allocation and security selection based on meeting individual client objectives and priorities.</p> <p>Full tailoring of portfolios is available to meet client needs, preferences and objectives ranging from income needs to company or sector exclusions based on ethical stances.</p> <p>Engagement with BIMs is available to all clients ensuring that investment needs and objectives are taken into account when constructing the investment portfolio; initial and ongoing suitability is assessed either by the regulated intermediary or the BIM to ensure that the service is and remains suitable for the client.</p> <p><b>Non-financial benefits include:</b></p> <ul style="list-style-type: none"> <li>▪ Full client reporting including tax reporting designed to allow easy transference to a UK tax return</li> <li>▪ Access to an online client portal and app with 24/7 access available (outside of announced maintenance times)</li> <li>▪ Access to BIM and support staff whenever needed including a minimum of biennial suitability assessment</li> <li>▪ Facility for BIM to liaise with other professional connections where appropriate and authorised by the client</li> <li>▪ Access to Close SIPP (provided under advice), ISA &amp; JISA is available where appropriate.</li> </ul>

Additional information for vulnerable clients	Details of any additional foreseeable harms and means of mitigation by manufacturer and distributor for clients with characteristics of vulnerability	Foreseeable risks or harms	Mitigation
		<p>Clients unable to engage fully with the process of risk profiling and objective setting may not benefit from the bespoke nature of the service</p>	<p>CBAM would require a personal representative or intermediary to be involved where relevant to ensure the client is appropriately onboarded and has full understanding</p>

<b>Assessment of Fair Value</b>	<b>Outcome of last Assessment of Fair Value</b>	Having assessed the costs and benefits of the Service to the Target Market along with competitor analysis and examination of data on existing clients, we have concluded that the Service provides Fair Value.	
	<b>Date</b>	<b>Last Review</b>	<b>Next Review</b>
		June 2024	June 2025
	<b>Any issues in Assessment of Fair Value identified</b>	None	
<b>Details of actions being taken as a result of Assessment of Fair Value, if any</b>	Additional testing is being carried out on client understanding of application forms and literature to ensure that client communications are clear and easy to understand		

<b>Additional information for distributors</b>	<b>Intended distribution strategy (for example: advised, non-advised etc)</b>	New clients are sourced through a combination of BIMs' own connections plus business introduced through: <ul style="list-style-type: none"> <li>Financial advisers</li> <li>Professional introducers, including Investment Consultants &amp; Solicitors</li> </ul>
	<b>Additional information which may be useful to distributors</b>	N/A