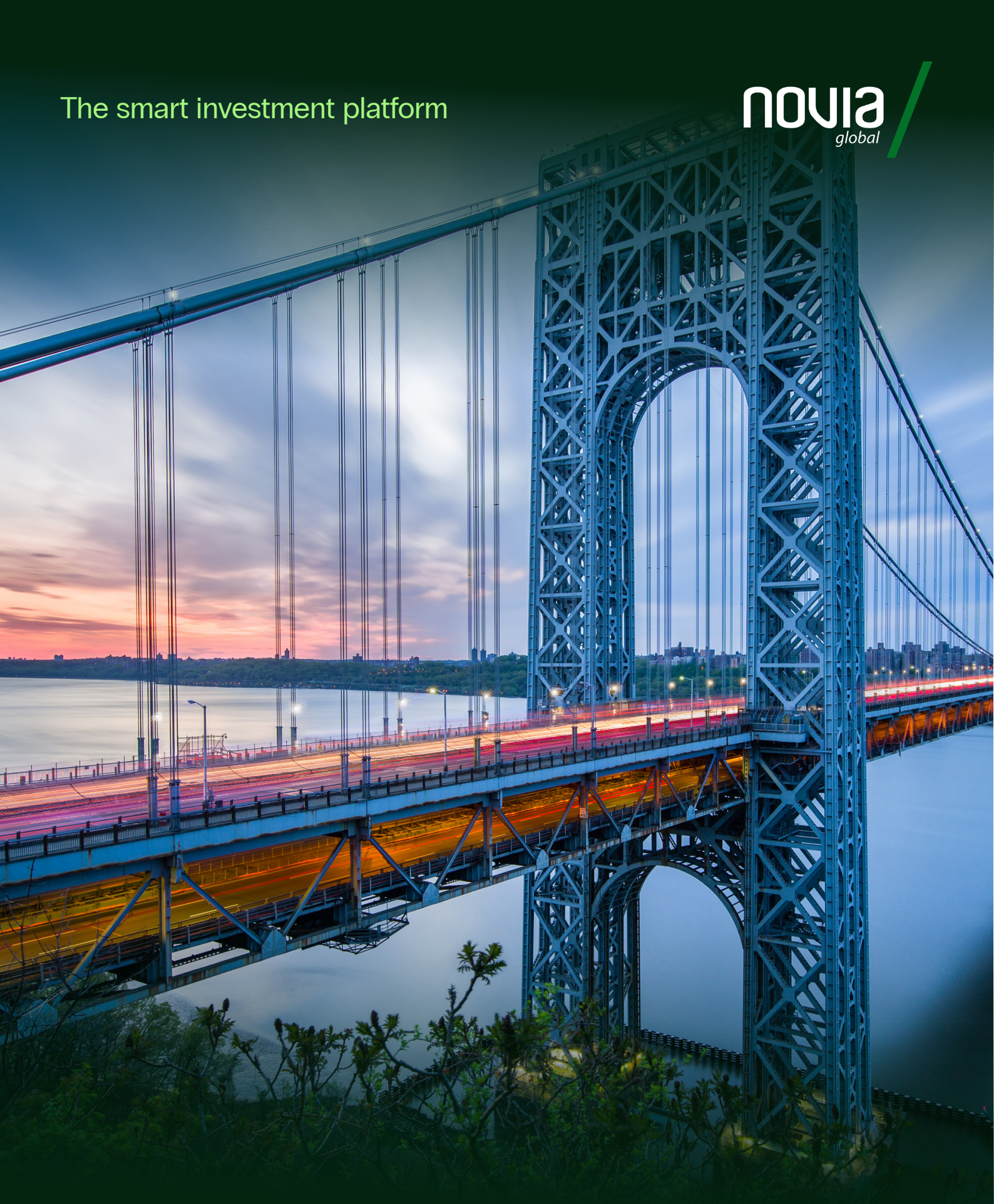
The smart investment platform



Target Market Statement - ISA

For advisers only

Target Market & Controls

The Novia Global Individual Savings Account (ISA) is a Stocks & Shares ISA which is provided and distributed through Novia Global Ltd. This will be updated once Novia Global Europe is incorporated and launched. Our target market for overseas advisers is for those who recognise the importance of UK-style Retail Distribution Review (RDR) and the transparency to clients that this provides.

The product targets UK expatriates with ISA benefits accumulated whilst being a UK resident who now reside outside of the UK and either plan on returning to the UK or could potentially return.

Whilst the ISA is held abroad, tax in most foreign jurisdictions will still be applicable. However, as the ISA retains tax deferral / resistance in the UK, it may still help avoid a double tax or dividend distribution tax analysis in some jurisdictions.

Only ISA transfer business (as cash) is permitted, and further contributions for new monies cannot be accepted.The source of transfers must be ISA savings from UK earnings.

To ensure positive outcomes for our customers, we have incorporated the following features:

The Novia Global ISA is available only through authorised financial advisers with their country's regulator, or advisers with the appropriate passporting permissions that have entered into a Terms of Business agreement with Novia Global Ltd (direct to consumer business is not accepted).

Advisers must agree fee payments with their clients, and decency limits apply.

Only 'clean' standard funds are available.

Benefits will be paid out only to a verified bank account in the client's name.

Investment product providers must be FCA regulated or approved.

Investment products are limited to FCA standard assets, as defined in IPRU-INV.

Novia Global Limited is incorporated in England and Wales with company number 09042249. Registered office: 22 St Lawrence St, Southgate, Bath, BA1 1AN.
Novia Global Limited is authorised and regulated by the Financial Conduct Authority. Register Number: 653661.

Who is our ISA designed for?

The Novia Global ISA is designed to help customers invest for the medium to long term.

It offers:

- The ability for UK expats to hold onto their ISA nest egg.
- On-going investment alignment.
- A wide range of simple investment options.
- Easy access to savings at any time for emergency withdrawals.
- The ability to transfer in ISA cash from other providers to consolidate ISA savings.
- Secure online access that allows customers to view their ISA investments.

Vulnerable Clients

Any client can become vulnerable on a temporary or permanent basis. Novia Global staff are trained to assist advisers, vulnerable customers & their representatives. So vulnerable customers will receive the same high level of service as other clients.

Our ISA is not suitable for clients who...

- Are a UK expatriate intending to be a permanent overseas resident.
- Do not wish to use the services of a financial adviser.
- Want to manage their own investment.
- Want to subscribe new monies.
- Are interested in complex, non-standard investment options.
- Do not wish to take an element of financial risk with their investment.
- Require a guaranteed rate of return.
- Are aged under 18.
- Are a UK resident.

It is most suitable for customers who:

- Are a retail client aged 18 or over.
- Are a UK expatriate who will be returning to the UK or could potentially return.
- Would benefit from retaining a UK tax-efficient product.
- Wish to transfer existing ISA(s) to take advantage of our wealth consolidation with investment options all in one platform and resource for their advisers.
- Are seeking a medium to long term investment solution, even though capital maybe at risk.
- Want investment advice and have a basic level of financial capability and consent to, the advice being given.

Risks

Tax treatment in different jurisdictions will vary based on your residency and savings may be liable to either income tax, capital gains tax or even wealth tax, depending on the tax rules in a client's country of residency.

Clients should clarify with their local tax authority, or suitably qualified tax adviser, how they should report the assets held within the ISA.

Investments should be considered over the longer term and considered with the client's overall attitude to risk and financial circumstances.

The value of investments (and any income from them) can go down as well as up and the full amount may not be able to be retrieved.

Past performance is not a reliable indicator of future performance.

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Service Quality

Novia Global Ltd provides services to defined standards. Our aim is to open your account, allow your money to be invested and return your money to you as efficiently as possibly whilst ensuring we minimise risk to you. We aim to deal with your queries efficiently and in a way that is easy for you to understand. Our platform is available 24 hours a day, 7 days a week, with dedicated call handlers available during UK business hours and emails answered in line with our defined terms.

Assessment

The fact that Novia Global Ltd strives to provide services to defined standards shows their commitment to providing high-quality services to their clients. This is important as it provides consumers with the assurance that they will receive a high standard of service. Novia Global continues to invest in both technology to streamline processes, improve service standards and staff to ensure we meet these standards. We monitor standards on an on-going basis to monitor progress and drive performance.

Security of Your Investments

Novia Global is authorised and regulated by the FCA and adheres to the Client Asset Source Book (CASS) and client money rules to ensure that your investments are held securely. All monies and assets are held in segregated client accounts and are never mingled alongside Novia Global's own money, in doing so ensuring that were Novia Global ever to fail, clients would never lose their money. Novia Global also operates an Investment Committee and SIPP Operator Committee to ensure only appropriate investments are made available and our pension operates at within its defined rules, terms, and conditions.

Assessment

Novia Global carries out detailed due diligence on both its custodian and banking partners on an annual basis to ensure your investments are held securely.

By adhering to the FCA regulations we monitor these daily and deal with any discrepancies in a timely manner to ensure you will get back what you expect, ensuring money and assets held on our platform remain safe.

Security of Your Data

Novia Global takes data security very seriously and invests heavily in technology and processes to keep your data safe.

Assessment

All data held by Novia Global is encrypted both at rest and in transit to keep it secure. In addition, access to data internally is only given to those who have a requirement to access it, and this is reviewed on a regular basis. Novia Global also invests in other methods of securing both the data and the Novia network, including firewalls, antivirus, access control lists, and penetration tests. Thorough due diligence is carried out on potential technology partners to ensure they have the same approach to cyber security as Novia Global, which ensures data security throughout the Novia Global proposition.

Conclusion

Novia Global Ltd offers a comprehensive range of investment products and services that cater to the needs of UK expats. The tiered fee structure and dealing fees are reasonable and provide value for money. The commitment to defined service standards also provides assurance to consumers that they will receive a high standard of service.

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