The smart investment platform

novia global

Information Pack

For Professional Advisers only

Contents

About this pack

Welcome to the Information Pack for the Novia Global Wealth Management Service. We have put this together to make collecting key information about us and our Service as easy and straightforward as possible.

Novia Global provides a platform service for Advisers, Private Banks, Trust Companies and their clients. It was created to meet the investment needs of the internationally mobile client, nationals who have moved abroad and trustees requiring access to greater investment choices.

We provide researching, investing and reporting capability for Financial Advisers, Private Banks and Trust Companies with international clients.

We do this through our web-enabled, technology and supporting services that have been specially designed for the multi-currency, cross jurisdiction requirements of the international investment environment.

This pack is designed to support the information gathering processes of organisations that are considering taking advantage of our specialist technology and services to reduce the administrative burden associated with selecting, making and reporting on investments. It is constructed as a compilation of key documents that explain who we are, what we offer and how we work.

About Novia

New

Novia Global launched to market in October 2015, bringing the benefits of the latest in online platform technology to the key international markets.

Our service

We provide a platform service for Advisers, Private Banks, Trust Companies and their clients.

Strong and independent

We are completely independent with a focus on providing a service that delivers the opportunity for growth, control, flexibility and adding value.

We are

Very simply - we provide the technology to help simplify the complex world of investment management.

Awards & Ratings

Investment International Awards 2025
WINNER
BEST INTERNATIONAL PLATFORM

IA International Adviser Global Financial Services Awards 2025
WINNER
INTERNATIONAL PLATFORM OF THE YEAR

IA International Adviser Global Financial Services Awards 2025
WINNER
OUTSTANDING BUSINESS CONTRIBUTION

AKG B
FINANCIAL STRENGTH RATED
INT. PLATFORM SECTOR STRONG
NOVIA GLOBAL LTD

The Leadership Team

The team behind Novia Global brings extensive experience in delivering technology-led wealth management services. Drawing on this expertise, we are well positioned to develop and support a robust, fit-for-purpose solution tailored to the needs of the international market, while operating with full independence.

Chief Executive Officer
Steve Andrews

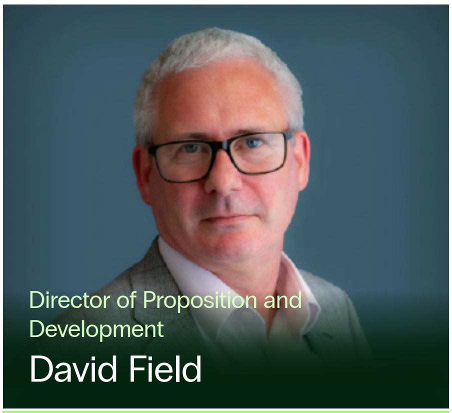
Steve has over 30 years' experience in financial services, spanning retail and institutional asset management platforms as well as life and pensions, both in the UK and internationally. He joined Novia Global in 2019 to lead the business into its next phase, with a focus on delivering clear, transparent and high-quality online services.

Sales Director
Chris Skelhorn

Chris has over 25 years' experience in sales and account management within the investment industry. Since joining Novia Financial in 2009, he has developed deep insight into how platforms can support advisers, drive efficiency and deliver comprehensive investment choice.

Chief Operating Officer
Paul Parry

Paul has held senior leadership roles as both Finance Director and Managing Director within the IT industry. He brings broad operational experience gained in highly regulated and constantly evolving environments.



Director of Proposition and Development
David Field

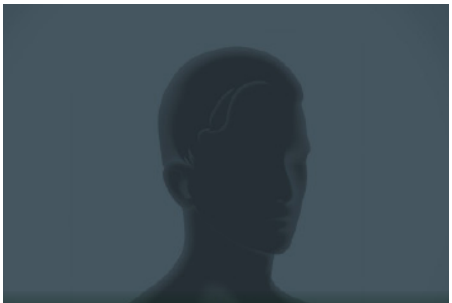
David has over 20 years' experience in the platform industry, including leading institutional business at Novia Financial. He brings extensive expertise in managing large-scale migration projects and developing discretionary investment propositions.

Board Director
Tony Stevens

Tony has more than 40 years' experience in financial services, having held senior roles across operations, marketing and compliance. He is also a trustee of two charities, chairing one of them.

Commercial Director
Michael Philips

Michael brings over 20 years' experience in financial services, having joined from BNP Paribas where he was responsible for commercial strategy and growth. At Novia Global, he oversees technology and development alongside responsibility for the investment proposition and marketing teams.



Director of Risk and Compliance

Ben Cram

Ben has 20 years' experience in financial services, with exposure across investment, insurance and banking products. He has a specialist background in risk and compliance, from supporting start-ups through to large multinational firms, including contributing to the successful sale of an investment platform to AJ Bell plc.

An experienced board

The Novia Global's Board comprise Steve Andrews (CEO) Paul Parry (COO), and the following non-executive directors:

Marlborough Founder

Andrew Staley

Matrix Securities Co-Founder

David Royds

Non-Executive Deputy Chairman

Donald Mackinnon

Non-Executive Director

Richard Goodall

Legal structure and ownership

Novia Global Limited is a limited company that is registered in England and Wales (Reg No. 9042249). Its registered office is Cambridge House, Henry Street, Bath, BA1 1JS.

Novia Global is independently owned by private individuals along with small and medium-sized enterprises with significant financial services experience who are committed to the longevity and continued profitability of the business. The principal financial backers are David Royds (ex-Chairman and co-founder of Matrix Securities), and Andrew Staley. Andrew Staley has 44.92% of the voting rights of the company.

International Sales Managers

International Sales & Technical Manager

Paul Forman

Paul has more than 25 years' experience in financial services, including over 20 years in adviser-facing sales roles. A Chartered Financial Planner and Fellow of the Personal Finance Society, he brings strong UK and international experience from roles with offshore life offices and international pension trustees.

International Sales Manager

Darren Moth

Darren has worked in financial services since 2005, with experience across paraplanning, support team leadership and practice management within adviser firms. He is a Chartered Financial Planner and Fellow of the Chartered Insurance Institute, drawing on his platform knowledge to deliver high levels of customer service.

International Sales Manager

Rob Montague

Rob has over 30 years' experience working with advisers in the financial services industry. For nearly two decades, he has worked closely with financial advisers, trust companies and discretionary managers across the UK and Channel Islands.

DIFC Representative Office - Dubai

Principal Representative Officer

Mark Maplesden

Mark has worked in financial services since 2007, he has now been based in Dubai for over ten years and has extensive experience working with advisers and clients across international markets. Mark has a strong background in financial sales, investment management, retirement planning and wealth management.

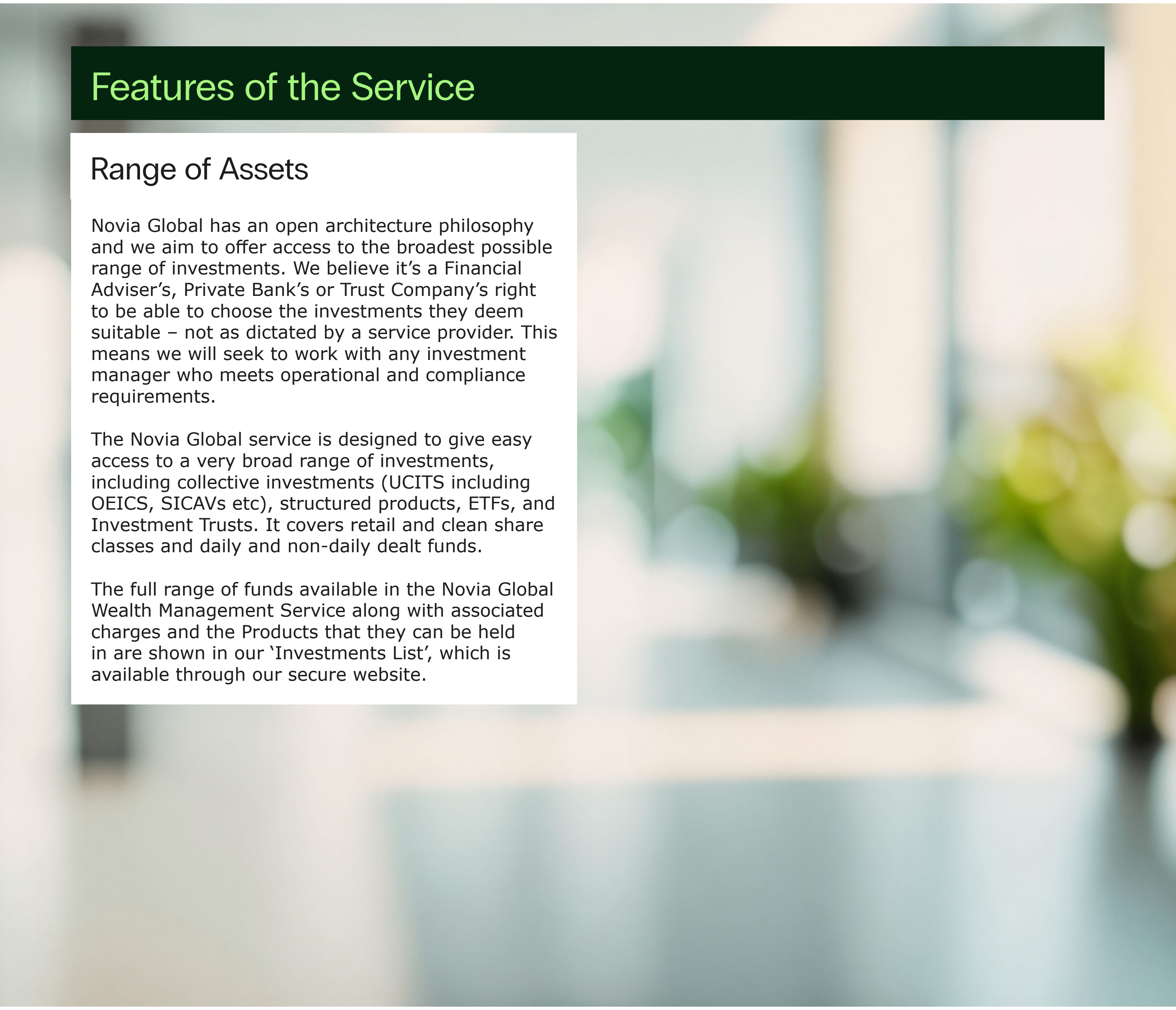
Availability of the Service

Intermediaries from which we will accept business

We will only accept applications introduced through an authorised financial intermediary, who has applied for and entered into a Terms of Business with us. We do not accept applications directly from clients.

The intermediary can be a financial adviser, a trust company or a private bank. It must be authorised by a recognised regulatory body in one of the jurisdictions in which we offer our services. It is the responsibility of the intermediary to ensure that it has the appropriate local registrations or authorisations to provide services in the jurisdictions where any of its clients' reside.

Through our Investments List we will provide information about the investments available. However, it is the responsibility of the Intermediary to ensure that any product or any investment is suitable for, and available to, their clients. This also involves making sure the Intermediaries abide by any local regulations (for example, the appropriateness of rebate paying funds).



Features of the Service

Range of Assets

Novia Global has an open architecture philosophy and we aim to offer access to the broadest possible range of investments. We believe it's a Financial Adviser's, Private Bank's or Trust Company's right to be able to choose the investments they deem suitable – not as dictated by a service provider. This means we will seek to work with any investment manager who meets operational and compliance requirements.

The Novia Global service is designed to give easy access to a very broad range of investments, including collective investments (UCITS including OEICS, SICAVs etc), structured products, ETFs, and Investment Trusts. It covers retail and clean share classes and daily and non-daily dealt funds.

The full range of funds available in the Novia Global Wealth Management Service along with associated charges and the Products that they can be held in are shown in our 'Investments List', which is available through our secure website.

Products

In a Novia Global Client Account, a product is a way of holding investments. It enables you to:

Aggregate

Aggregate assets held to align reporting and treatment with the appropriate regulatory structures so that clients can easily see a collective view of their investments.

Evaluate

Show valuations and charges for each product in a clear manner.

Choose

Easily select those assets that are appropriate to hold in a particular Product for a specific jurisdiction from the wide range of investments on offer.

We offer three types of product.

Global Investment Account (GIA)

The Global Investment Account is a general investment account. Clients will be able to make unlimited payments into the currency holdings within the GIA and benefit from the:

- reporting and tools
- range of investment opportunities
- wide choice of funds
- competitive charges from Fund Managers
- handling of investment strategies through model portfolios and DFMs

UK SIPP

The Novia Global UK SIPP is exclusively available through the Novia Global platform, costs £60 (inc VAT where payable) per quarter and has no establishment fee. It is fully integrated into the Novia Global platform and therefore enables you to leverage on the considerable experience we have in dealing with UK ceding scheme trustees and thereby reducing transfer pipeline wait times.

In addition to its low cost, you can also benefit from:

- A streamlined application process.
- An on demand client portal which provides your clients with access to “read only” information on their account.
- A simplified investment process through online platform trading
- 24/7 access to generate reports and valuations
- Access to low cost multi-currency
- Further information on our UK SIPP is available in our Key Features document, or through your Novia Global International Sales Manager.

Stocks & Shares ISA

The Novia Global Stocks & Shares ISA allows 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 to hold onto their ISA nest egg.

Further information on our Stocks & Shares ISA is available in our Key Features document, or through your Novia Global International Sales Manager.

Currencies

The Novia Global Wealth Management Service provides the flexibility for a client to:

Pursue multiple investment strategies in a single currency and across different currencies.

Work with one or more Portfolio Management Service eg Discretionary Fund Managers.

Invest and disinvest in a range of currencies.

This allows complex investment strategies to be followed whilst producing straightforward, meaningful reports and conducting transactions efficiently. The Service reports and facilitates investment in US Dollars (USD), Sterling (GBP), Euros (EUR), Swiss Franc (CHF), Hong Kong Dollars (HKD) and Australian Dollar (AUD).

In each currency holding there is a cash facility. This provides liquidity and holds funds for investing and withdrawals. Money from sales and dividends generated from within the specific currency holding will be paid into its cash facility and the relevant fees and charges will be paid from it. A minimum of 2% of the value of the currency holding will be maintained in the cash facility to meet these obligations. All cash and investments are managed by Novia Global in accordance with the rules of the Financial Conduct Authority.

Straight through Processing (STP)

Novia Global utilises genuine straight through processing technology. This is from an online application and Product opening process, asset allocation, selection and portfolio construction tools straight through to investment transactions being processed in our back office. This reduces the chance of errors and improves efficiency. Regular status updates online ensure you can see how business is progressing as it is processed.

Switching Processes

A Financial Adviser, Private Bank or a Trust Company selects the funds they wish to switch out of and specifies what percentage they wish to sell down. They will then choose the new investments via the Novia Global asset selector tool and these will be purchased upon receipt of sale monies.

White Labelling

Novia Global provides white labelling to allow users to brand their use of the Service. This includes client view screens and output from tools such as the Portfolio Scanner.

Discretionary Fund Management

Novia Global's Discretionary Fund Management (DFM) capability offers access to a range of DFMs through its Wealth Management Service. It enables Advisers, Private Banks and Trust Companies to keep control of the assets whilst outsourcing investment management to a DFM. The assets remain within the Novia Global nominee and do not come under the ownership of the DFM. Appointment of the DFM can also be handled through the Wealth Management Service so that the Intermediary remains in control at all times.

DFMs can offer model portfolios or bespoke portfolio management as required and can be remunerated transparently through the Investor's Cash Facility.

We can provide access to these discretionary management services at a much lower cost than a firm may get going direct through the use of model portfolios that increase efficiency for the DFM. In many cases we can also remove the often prohibitive minimums that could stop clients accessing such services. Our use of model portfolios ensures a streamlined, bulk rebalancing and switching process, automatically aligning all clients as instructed to the model concerned, thereby reducing risk to an Adviser.

Discretionary Fund Managers

Management Information

Management Information (MI) is available for users of the Novia Global Wealth Management Service. Through our secure website, you will have access to a range of user friendly reports. Initially, a comprehensive "Client Valuation" report will be available, which will also include the facility for backdated valuations to be produced.

Going forward, the range of reports on offer will be greatly expanded to cover all aspects of business written through Novia Global.

These are designed to provide supporting information about holdings in the Novia Global Wealth Management Service at the touch of a button. Reporting is:

Intuitive

Designed to be straightforward and uncomplicated to use from start to finish.

Accessible

Online web application will be available at any time through the Novia Global website.

Quick

You are able to download and export reports in a matter of seconds.

Updated Daily

The information is refreshed daily from the Novia Global system and Financial Express pricing data.

Flexible

All reports are downloadable in several different formats which can be manipulated and edited, used as part of an audit trail, printed for clients and recorded for compliance and management purposes.

Comprehensive

Reports cover all aspects of business written through Novia Global - including clients, valuations, remuneration, investments and transactions.

Access to the various reporting levels can be set by your firm's Service administrator. The information provided to an individual is aligned to the role that you have assigned to them within the system. This is to meet the different requirements of Senior Management/owners, client managers and administrators.

Tools Provided

The Novia Global Wealth Management Service comes with a comprehensive suite of tools for its users.

Our tools have been developed in conjunction with expert suppliers, such as Financial Express, to provide the means to simply and easily inform and manage investment decisions. We add further value by cutting out unnecessary paperwork and removing time wasted by avoiding the need to re-enter data. The tools enable Advisers, Private Banks and Trust Companies to create standalone reports, to help build portfolios and to support full investment reviews.

Asset Selection

We support Advisers, Private Banks and Trust Companies in identifying assets that fall within the firm's permitted jurisdiction. Only funds that are authorised and available for purchase within the relevant jurisdiction are presented for selection. Our Asset Selector provides filtering tools to further refine the results, narrowing the displayed funds to those that align with the firm's regulatory scope and internal criteria.

We also provide you with the functionality to generate an optimised range of assets based on a risk profile, (from our Risk Profiler or from other sources) and make available for selection all of the pre- built model portfolios. These can be used as the basis of a new portfolio and users will be able to amend the assets selected as required.

Fund Information - Documents and Downloads

Users of the Novia Global Wealth Management Service have access to information on a comprehensive range of funds. In addition to the Novia Global fund universe, we supply information on an array of other universes including: UK ABI Pensions, UK Mutual, UK UT and OEICs, Hong Kong Mutual, Singapore Mutual, Malaysia Mutual, Germany Mutual, Switzerland Mutual, Offshore mutual, Ireland Offshore and Global ETFs. Users are able to easily identify those assets that are of most interest using a wide range of filtering methods.

All key documentation provided by the fund managers is available for download. This includes documents such as the provider's factsheet, Key Investor Information Document, Supplementary Information Document, Prospectus, Annual Report, Product Highlights Sheet and the Key Facts Statement. They can be downloaded individually or can be selected through a download tool. This tool enables users to specify the reports that they want and to capture them as a single pdf, to the extent that regulation allows. The download tool is also a gateway to dividend information that can be shown on screen or downloaded into an excel document.

Secure Client Portal

Our secure client portal allows clients to track all their investments held in the Novia Global Wealth Management Service. It offers secure access to valuations and the detailed composition of portfolios.

As a secure, view-only online portal, it is available wherever there is internet connectivity so clients will be able to check on their investments at their convenience. The application resizes the display for use on mobiles, tablets and PCs and, by choosing to install the tile on the device, the service will be just one tap away.

On logging in, clients will see a dashboard view on their home screen. It will show the total amount they hold in the Novia Global Wealth Management Service, the value of funds by Product (GIA or UK SIPP) and the overall asset allocation by sector.

Selecting a Product will reveal its breakdown by the currency holding within it. It is possible to investigate each of these further. Selecting a currency holding will show the funds it contains, the proportion of the sectors represented and their values. Charts will show movement in value for the currency holding and the money in and out of it over a 6 or 12 month period. By selecting "Transactions" a full list of all money movements, including charges, will be shown.

In addition, clients have access to a library of important documents about their use of the Service. These are available for download as PDF's.

To support efficient communication and the effective provision of their service, Advisers, Private Banks and Trust Companies will be able to see the same information in the same format as their clients.

Risk Profiler

Assessing a clients' attitude to risk is a key aspect to giving appropriate advice. To assist with the fact finding process we provide a Risk Profiler tool. By analysing a client's responses to a series of questions, this standalone tool provides a standardised approach with an auditable, client focused output.

Assessing Risk	Our investment and actuarial consultants have constructed a Risk Assessment Questionnaire of 12 questions that fall into three main categories. • Investment details - These questions obtain factual details about the client's plans for the investment • Importance and expectations - These questions enquire about the relative importance of the amount being invested and the expected outcome. They are designed to assess the client's capacity to take on risk • Tolerance of investment risk - These questions investigate how the client feels about various possible outcomes from their investment portfolio The responses that the client provides are analysed using our consultant's algorithm to produce a risk score of 1 to 10.
Risk Score	The risk score is calculated in the following way. 1. The possible answer for each question is assigned a score between 0 and 100 that indicates where the client sits in terms of risk. 2. Each question also carries an 'importance weighting' reflecting how close a proxy the response is for investment risk. 3. The weighting is applied to each score and these are summed to produce a total. 4. This total is then mapped against the normal distribution of responses found in the population to produce the final risk score of 1 to 10. 1 reflects the most risk averse investors and 10 are those with the greatest appetite for investment risk.
The Report	The output from the Risk Profiler is a report that contains: • a record of the client's responses • the risk score for the client • an explanation of what the score means • the ability to include your own bespoke commentary • a declaration for the client to sign for your records This is produced as a PDF which can be printed and emailed.

Adopting a standardised approach helps produce consistency across clients. The ability to easily and quickly generate comprehensive risk assessment documentation, and retain copies agreed by clients, supports both transparency and compliance activities. These are benefits provided by our Risk Profiler.

Fund Comparison Tool

To help with fund selection we have also included a comparison tool. This allows users to select up to four funds from those that they have placed in the portfolio for investigation and produce a pdf report that shows:

- type of fund
- charges
- historic performance
- ratios and risk measures
- underlying holdings

This is highly flexible and will provide documentation that will help to communicate the strengths and weaknesses of funds across sectors, currencies, share classes etc.

Fund Charting

Our Fund Charting tool allows Advisers, Private Banks and Trust Companies to monitor the performance of selected funds over a choice of time periods and compare these to other funds and benchmarks, such as sector averages and indices.

This covers all assets offered by the Novia Global Wealth Management Service (the Novia Global Asset universe) and 11 other fund universes eg Singapore Mutual, Germany Mutual etc. The assets include Societe d'Investissement a Capital Variable (SICAVs), Undertakings for Collective Investment

in Transferable Securities (UCITS), Exchange Traded Funds (ETFs), alternative investments, structured products and direct investment in equities and bonds.

Portfolio Scanner (P-Scan)

We give Advisers, Private Banks and Trust Companies the ability to "drill down" within portfolios to analyse asset allocation, geographical/ sector split, return compared to benchmarks and risk rating. Our portfolio scanner, which provides this breakdown of a client's investments, is called P-Scan. It is available to use as a standalone tool for initial client research or integrated into a broader portfolio review. The reports generated are useful for client updates and annual review packs. They can be tailored to your requirements and your firm logo can be added.

Access and charges

We allow the tools we provide to be used by all registered users for any of their client's at no additional charge. We will develop new tools and improvements to meet the needs of the international marketplace.

Implementation & Support

The typical support that Novia Global provides is set out below. We tailor it for each organisation so that we can meet specific requirements and help to maximise the benefits that our Service offers. We have identified 5 stages in the Implementation process and we offer support for each.

Stage 1 - Initial Engagement

The process starts with initial engagement with a sales manager at Novia Global. At this early stage we seek to gain a strong understanding of the requirements of the specific firm, be it a Financial Adviser, Private Bank or Trust Company. It may include an initial WebEx demonstration of the platform with nominated individual(s) and is normally around the time when Terms of Business (TOB) are signed. A TOB agreement will need to be entered into to enable use of the Novia Global Wealth Management Service.

Stage 2 - Introduction & Planning

Following completion of a TOB, we work with a firm to understand its training requirements and to identify the appropriate individuals for specific training. This is documented and the training plan agreed for us to deliver online training.

Stage 3 - Deliver Training

The next stage is to deliver training according to the agreed plan. Each training plan will be tailored to specific individuals in the business to meet the users' specific requirements and covers configuration, transacting, research activities and servicing. Examples of the areas covered are set out below.

Configuration

Set-up of user access, including issuing logins and providing training on each level of access.

Third Party Integration assistance, if relevant.

Transacting

New Business
AML
Trading
Top-Ups
Switches
Withdrawals

Platform Tool

Illustrations
Research Hub
Investments List
Risk Profiler
Reports
My Tasks
Documents
Secure Mail
Support
Contact points

Stage 4 - Go Live Support

We offer go-live support for an agreed period for firms that are new to the Service when they are ready to submit business onto the platform. This is to ensure the easiest possible adoption and helps to underpin the transition to the new technology in a "live" environment.

Stage 5 - Business as Usual

Once the training plan has been completed, and all parties are happy that users are able to use the systems effectively, the implementation phase moves into "Business as usual". Our Client Services Team remains the principle contact-point for future assistance.

Your firm will receive on-going support as and when needed to ensure that you are able to effectively use system enhancements. This includes ensuring key people within the firm have the knowledge they need to use the platform as they require.

Security of Client Money and Assets

When advising clients, financial intermediaries need to consider the risks to their client's money (cash and cash deposits) and assets (eg: funds, stocks and shares). This document considers the risks that clients face when investing through the Novia Global Wealth Management Service and how these are minimised or mitigated.

Investment Risk

Novia Global does not provide financial advice but delivers a service that enables the effective administration of investment choices by intermediaries (financial advisers, trust companies and private banks). We consider that the performance of investments is the most significant financial risk faced by clients. We recommend that the prospectus, Key Investor Information Document (KIID) and associated documents are studied and that the inherent risks are clearly understood. As under the regulations, we make these documents, and pricing and comparison information, available through our Research Hub.

Strict Regulatory Oversight

Novia Global Limited is authorised and regulated by the UK's Financial Conduct Authority (FCA); registration number 653661 to administer client Money and Assets. Our systems and processes aim to ensure that all transactions are carried out in accordance with UK FCA regulation. An integral part of our pursuit of best practices in client money and assets protection.

Segregated Accounts and Business Failure

The approach that we take reduces the client's risk of loss from business failure.

Client Money

We hold all client monies in segregated client money accounts, in accordance with the FCA's CASS rules and guidance. All client money accounts are protected by Acknowledgement Letters signed by HSBC and Santander, meaning that should the worst happen the creditors of Novia Global would not have any legal right to client money bank accounts nor can we use it to cover Novia Global's obligations. We currently use HSBC Bank plc Jersey Branch (HSBC) as our main holding bank and Santander Financial Services Plc - Jersey branch, for client money diversification.

Client Assets

Unit trusts and OEICs have a requirement to use a trustee or depositor to hold the underlying stocks that are held in their funds. Therefore, for investment of this type, a Fund Manager in financial difficulties would have no access to the client assets held by the trustee (or depositor). The risks from the business failure of the key parts of the investment chain are outlined below:

Business	Role	Impact on Client
Novia Global	Administrator	On failure an Administrator would be appointed. Failure may lead to a delay in instructions being processed.
Pershing (Channel Islands) Limited	Custodian	On failure an administrator for these duties would be appointed. There is a risk that money or ownership transactions between the trading agent, custodian and fund manager may be lost.

Capital Adequacy

Novia Global is registered with the Financial Conduct Authority to hold client money and assets. As part of that registration and with recent changes to regulation the business is required to hold regulatory capital in line with MIFIDPRU rules and the FCA Handbook. The new rules require the business to record and report K Factor values as well as have an Internal Capital and Risk Assessment (ICARA) and a full wind down plan in the event of failure.

The business is compliant in all regards and keeps a minimum of 1.2 times the regulatory capital required. We review this requirement on a regular basis and report to the FCA through regulatory submissions periodically as defined by them.

Internal Risk Control and Fraud Prevention

Novia operates a structured and controlled environment, in line with the FCA requirement, to minimise the risk of mistakes and fraud. Key aspects of our framework include:

- A Director of Risk and Compliance who is responsible for helping ensure the business remains compliant and assists with managing any recognised risks to ensure these are controlled and mitigated where possible.
- A monthly CASS Committee that reviews and assesses the effectiveness of our systems and controls and provides oversight to the main processing within the business to confirm compliance.
- Review and regular sign-off of risk and control matrices at all levels of the organisation to ensure controls are operating effectively.
- Provision of initial and refresher training to all staff covering their responsibilities.

These systems ensure that all investment activities are scrutinised by multiple individuals, that there is clear responsibilities and any concerns are raised to the Board of Novia Global.

Reconciliation and Auditing

Novia Global holds the individual client registers and reconciles client money and assets both internally and externally against those aggregated records of Pershing, HSBC, and Santander on a daily basis.

We also have a CASS Committee which meets at least on a monthly basis or more frequently when there are client money and assets matters to discuss. The committee's chairman with support of other members of the committee has overall responsibility for oversight and governance of all CASS related affairs of the firm including but not limited to review and discussion of breaches, client money & assets exceptions, and monthly regulatory submissions (CMAR) to the FCA.

As a UK Company, under the FCA rules Novia Global has to have an annual client money and asset external audit, known as CASS Audit. This is to confirm that all process and procedures are being carried out in accordance with regulations that protect client money and assets. We have appointed PFK to undertake this function as it is a world renowned, independent, international audit firm with in depth knowledge of CASS requirements. On this matter they (PwC) report the audit outcomes directly to the FCA and Novia Global's ARC (Audit & Rick Committee).

Notification and Transparency

We follow the transparency objectives set by the FCA and, as a core element of our business proposition, we place high importance on keeping clients informed about their holdings with us. In addition to providing a quarterly statement (which we provide as a pdf in the client's literature library that can be viewed online), clients can view online valuations and a detailed breakdown of all transactions through their Novia Global Client Account. Updated daily, these enable clients and Intermediaries to monitor performance or raise concerns without needing to wait for statements to arrive.

Our Business Approach

We are independently owned by private individuals and Small to Medium Enterprises (SMEs) with significant financial services experience. These are committed to the longevity and profitability of the business. We have a clear goal – the provision of wealth management services to Advisers, Trust Companies and Private Banks and their clients. We will only achieve our objectives by providing the choice, simplicity of use and security that is sought by the international investment community.

Novia Global Ltd has the reporting responsibilities of a limited company that is registered in England and Wales (Reg No. 9042249). Our registered office is Cambridge House, Henry Street, Bath, BA1 1JS.

Technology and third party agreements

Novia Global combines the very best of market leading technology, designed specifically for Wealth Management, with high quality personal service. We seek to make the processes efficient for the Advisers, Private Banks and Trust Companies with which we work with to support the best possible experience for their clients.

To do this we carefully select our suppliers for the capabilities of their existing systems, the ability to customise solutions and, more importantly, their long term development plans. Whilst we outsource the delivery of the core operating system, we develop and own the front-end technology which provides the added value and ease of use essential for a world class international Wealth Management Service.

This also allows us to deliver the personal service essential to our users and their clients. We maintain ownership of all data held on 3rd party software.

Novia Global has licence arrangements with GBST, Financial Express and other leading software providers.

Core Operating System

Novia Global works with a specialist provider, GBST, for its core operating system. Established in Australia, where over 90% of Adviser investment business is carried out through investment platforms, GBST has been developing software solutions for funds administration and financial services since 1996 and for platform solutions since 1999. They entered the UK market in 2003 and have established a reputation for delivering high quality, robust, functionally advanced software which has scalability to meet business demands.

We benefit from the economies of scale that such a business can provide – they are constantly upgrading their system. This allows our users to benefit from the latest technology without having to bear the costs of development individually. This delivers a constantly updated, sustainable and highly cost efficient approach. We use high quality technology to carry out our key function to aggregate and disaggregate assets – ensuring that in other areas we can add genuine value to both users and their clients.

Novia Global's strong relationship with GBST is a central plank of our business solution, with complementary companies working together to deliver market leading technology that works consistently. We have extremely low levels of downtime with the platform consistently maintaining 99.9% uptime (excluding scheduled downtime).

Data Providers

Financial Express are experts at providing specialist data for platforms and power our comprehensive suite of portfolio management tools. We combine our skills and knowledge to improve existing tools as well as developing new ones.

Data and System Security

Our hardware platform is a multi-cloud environment across both Microsoft Azure and Amazon Web Services. The design of the cloud infrastructure provides us with high levels of uptime, resilience and security across the entire infrastructure. Being fully cloud-based means that we have no reliance on a single physical site, and can fail over to different regions if required.

All of our infrastructure is protected and backed up at a level expected for an FCA regulated organisation. The security of the environment is tested annually to ensure continued performance. All backups are immutable and encrypted.

Disaster Recovery and Business Continuity

We have established a business continuity and disaster recovery policy that includes internal controls, policies, and procedures, as well as appropriate management oversight, monitoring, governance and training.

Our cloud-based infrastructure avoids any single point of failure and provides reliable and continual access to the Novia Global Wealth Management Service by authorised users and Novia Global staff. It allows for failover within and across regions if required, ensuring maximum possible uptime for the Novia Global platform.

The Novia Global infrastructure setup means that our employees can work effectively from anywhere. This means that we are not reliant on a single office location, and this fact forms a key part of the business continuity plan.

Key Policies

Best Execution

We maintain a best execution (or order) policy to help ensure we take reasonable steps to obtain the best possible result when executing orders. All instructions received by us will be dealt with in the order they are received and carried out in accordance with this policy to ensure they are treated in a fair and consistent manner.

We monitor dealing instructions at regular intervals to ensure they are carried out in accordance with the policy. We also review the policy's effectiveness each year and will let you know if we make any significant changes to it.

When you trade with us, trading will be considered to be your consent to this policy.

The terms and conditions contain further information about the way we handle transactions in the Transactions section.

Acting reasonably, we may delay or suspend the transmission of any trading instruction where an event, act or circumstance outside our reasonable control affects our ability to act on the trading instruction in accordance with the best interests of our clients or in accordance with applicable law and regulation (for example, market disruption).

Our trading agent

All trading instructions are sent to Pershing Securities Limited who we have contracted with through our custody agreement with Pershing (Channel Islands) Limited to provide trading and settlement services. For collective investments, Pershing will route dealing instructions to the appropriate fund manager for execution at the next available valuation point for that particular fund.

Aggregation

Where other relevant trades are taking place, we aggregate deals in collective investments (OEICS, SICAVS, UCITS) and exchange traded funds.

All valid instructions will be aggregated in the same asset level on the same valuation point, for purchase or sale by unit or purchase or sale by value. We do not carry out net dealing.

Where a deal is unable to be placed, it will be carried over to the next available valuation point until it is determined that the deal is unlikely to be placed, at which point the instruction will be cancelled and you will be informed.

Aggregation can generally benefit our clients by:

- Reducing the overall cost of dealing administration
- Sharing dealing fees*
- Reducing the overall cost of custody
- Allowing clients to purchase an investment below the investment's minimum purchase requirements
- Allowing client holdings below the minimum holding requirement**
- Disaggregation of a deal may result in a fractional increase in units allocated which might not happen if dealing directly with the fund manager.

*these only apply to the broker commission and settlement fee linked to an ETF or Equity trade.

** these do not apply to ETF or Equity trades

However, there are circumstances where aggregation may be a disadvantage:

- Additional explicit charges (for example, a dilution levy) might apply
- Delaying part of the deal until a later valuation point
- Disaggregation where a fund manager rounds down may result in a very small decrease in units (typically only worth a few pence)

If any of these circumstances occur, charges will only be applied in line with the terms and conditions and assets or proceeds will not be allocated until the whole deal has completed.

Execution factors

Best execution factors are taken from the following set of criteria:

Price; Cost; Speed of execution; Likelihood of execution and settlement; The nature of the order and the investment/instrument being ordered; Order size; Venue; Any other criteria relevant to the execution of the order.

It is important that we explain to you clearly what "best execution factors" mean and how they may affect you and your investments. The "factors" that Novia take into account are specific to the nature of our service, both in relation to the investment buying and selling process and the type of investments bought and sold within your wrappers. They are:

- "Likelihood of execution and settlement": when Novia instruct a buy/sale of an investment, the level of certainty we have that it will take place, and (using the example of a sale) how certain we are that we'll receive the cash for it? This is the most important "factor" for Novia and is why we buy and sell all the investments with a single supplier.
- "Speed": from when we receive the instruction to buy and sell on your behalf, until the time we place the trade. This is an important part of our service and is why we have integrated our investment buying and selling process with Pershing.
- "Costs": considering the costs involved in the buying and selling process are important. Our single supplier approach for investments has enabled us to streamline our IT systems with our supplier, achieving greater efficiencies in the buying and selling process, which we believe is a better outcome for you, the investor.

Data Protection

This is relevant for all data protection and privacy legislation in force from time to time in the UK, including the UK General Data Protection Regulation and the Data Protection Act 2018. Novia Global Limited is a Data Controller, as referred to within the Data Protection Act 1998, authorised to maintain and store personal data. By accepting our terms and conditions, your client will also be giving their consent to their personal information being processed by Novia Global Limited in the following ways:

- for the operation of the accounts they hold with us
- to comply with the law or regulator's requirements
- to identify clients when they contact us
- for business analysis, research and testing
- to ensure the integrity of our systems
- to contact clients

We have a data protection policy and clients agree to all key aspects, which are referred to in our Terms and Conditions.

Please also refer to our Privacy Policy for more information. Novia Global - Privacy Policy

Conflicts of Interest

We operate a strict Conflicts of Interest Policy.

Conflicts of interest will invariably exist for us within the operation of our business. We maintain operational, organisational and administrative arrangements designed to prevent conflicts of interest from occurring or giving rise to a risk of damage to the interests of any clients.

In respect of the business that we conduct, the following summarises the measures we take to manage both potential and actual conflicts:

- Our employees are required to act in the best interests of each individual client and not to have regard to the interests of one client, Novia Global or an intermediary, over the interests of any other.
- We operate a policy of supervision of persons whose principal role is to carry out transactions or provide services to clients whose interests may conflict with each other, or with the interests of our firm.
- We operate measures to manage and monitor the duties of any persons who may exercise influence over the way in which another person carries out services and activities, where such involvement may impair the proper management of conflicts of interest.
- We operate procedures to prevent or control the exchange of information between persons engaged in activities involving a risk of a conflict of interest.
- We do not allow the remuneration of persons engaged in one activity to be linked to the remuneration of different persons engaged in another activity, where a conflict of interest may arise in relation to those activities.
- We ensure Client orders are carried out sequentially and promptly unless the order itself or prevailing market conditions make this impracticable.

We will take all reasonable steps to identify where a conflict of interest has arisen and notify where such a conflict results in a material risk. Where we believe we are unable to mitigate or manage conflicts of interest, we will disclose such facts or decline to act for your clients.

Fees & Charges

Adviser Charges

You can take adviser charges through the cash facility within each product wrapper. You have the flexibility to charge clients an initial fee, ongoing fee, or fixed fee within the following parameters:

- Initial (max 5%)
- Ongoing (max 2%)
- Ad-hoc charge (max 5% or 2% within a SIPP)

Platform Charges

The Novia Global Wealth Management Service has been built with the goal of delivering flexibility and choice. This extends to the charging structure. See the tier rate below.

Tier	Charge
<$0.5m	0.45%
$0.5m - $1m	0.40%
$1m - $1.5m	0.30%
$1.5m - $2m	0.20%
$2m+	0.10%

Full details of our charges are available on our charges schedule. This outlines the charges levied by Novia Global, how your remuneration is arranged and any other fees that typically apply to a client.

A cash facility is a fundamental part of every currency holding and this will be used to administer fees and charges. All amounts taken from it will be shown in the client's online transaction history. We do not apply the platform charge to any monies held in cash.

Our platform

Novia Global was set up in October 2014 to offer online wealth administration to offshore advisers and their clients. The platform allows professional advisers to trade into and out of assets on your behalf through an online system. The system has a cash facility to enable you to hold sufficient monies to cover your forthcoming need to pay fees (we require 2% of your overall investments to be held in cash for these purposes). Consequently, these facilities are not designed to be interest-bearing accounts where you can seek interest-bearing returns and therefore, Novia Global retain all interest on monies held in the cash facility.

Negative interest rates

In the event there are negative interest rates we will follow those provided by our main trading bank HSBC Jersey plc, who may apply a margin. We will also apply our own margin of 40bps to any negative rates to cover our own costs for holding cash. We also apply the 40bps margin on positive rates lower than 0.4% – where applicable. If interest rates are positive, Novia Global will normally receive a margin. Currently, across all currencies, we are receiving a blended rate of interest of 3.30% as at 31/12/2025. This rate changes regularly with movements in interest rates and this policy will be updated each quarter to confirm the blended rate at the time.