

## James Hay Partnership SIPP

### Permitted Investments List

**CLOSED  
TO NEW  
BUSINESS**

This document details the permissible investments for the James Hay Partnership SIPP (Partnership SIPP). For information relating to the purchase of these investments, please refer to the SIPP Technical Guide. Please also refer to the Important Notes section at the end of this document.

## Permitted Investments

SIPP Bank Account
Stocks and shares traded on the London Stock Exchange
Stocks and shares traded on the Alternative Investment Market (AIM)
Fixed term and fixed rate deposits with UK authorised deposit takers
Financial Conduct Authority (FCA) regulated Unit trusts and OEICs <sup>1</sup>
Government Securities
Debentures, loan stocks traded on a recognised stock exchange
Traded futures and options (relating to stocks and shares on a recognised futures exchange) <sup>1</sup>

Companies quoted on a recognised overseas stock exchange
Building Society permanent interest bearing shares (PIBS)
Insurance company managed funds and unit linked funds
Direct purchase of commercial property in the UK (including agricultural land, hotels, nursing homes and public houses)
Exchange Traded Funds
Investment grade gold bullion
Real Estate Investment Trusts (REITs)

<sup>1</sup> These investment types could be 'Complex Products' and where they are, we will only allow members to invest in them if they have received financial advice. Please see the section on Complex Products.

## Non-Permitted Investments

Direct purchase of residential property	Indirect investment in residential property and tangible moveable property i.e. where the pension fund purchases shares or units in a company or fund which enables the member or connected parties to control or influence the investment strategy of that company or fund. For example, the SIPP purchases 50% of the shareholding in a company which invests in residential property.
Direct purchase of tangible moveable property (art, antiques etc)	
Commodities	
Loans to connected parties	
Wasting assets (defined as having an expected life span of 50 years or less)	
Property limited liability partnerships	
Premium bonds	
Residential group rents	
	US mutual funds
	Direct purchase of commercial property overseas (including agricultural land, hotels, nursing homes and public houses)
	Contracts for Differences (CFDs) and CFD-like products <sup>2</sup>

<sup>2</sup> With effect from December 2018, in light of the FCA's restrictions on CFDs and similar products being sold to retail consumers.

## Permitted Investments (under certain circumstances)

<p>If you already hold one of these types of investments in your SIPP, you may be able to make additional investments (top ups) into the same investment, subject to our due diligence review and requirements in place at the time the investment is requested. If you wish to top up an existing investment, please read our Specialist Investments (also known as Non-Standard Investments) Guide for Clients and Advisers which is available from our website at <a href="http://www.jameshay.co.uk">www.jameshay.co.uk</a>.</p> <p>New investments (other than top ups) are not permitted into these types of investments.</p>	Non-Mainstream Pooled Investments (NMPs) - this includes Unregulated Collective Investment Schemes (including Offshore funds) and similar vehicles
	Pooled investment vehicles and syndicates where the member cannot influence or control the investment (known as 'Genuinely Diverse Commercial Vehicles')
	Shares in unquoted private companies
	Loans to unconnected third parties
	Hedge funds
	Second hand/traded endowment policies

<p>If you already hold an investment in an external bank account with no fixed term or fixed rate, you can make an additional investment (top up) into it.</p> <p>No new investments (other than top ups) are permitted into these types of bank accounts.</p>	External bank accounts with no fixed term or fixed rate, such as current accounts or access accounts
--	--

## Complex Products

We will only allow members to invest in Complex Products if they have received advice from a financial adviser in respect of the proposed investment.

Under regulations, there is no definition of Complex Products. However, the regulations do define Non-Complex Products as follows:

- Units/shares in a UCITS qualifying Collective Investment Scheme;
- Shares, Bonds and other forms of securitised debt admitted to trading on a trading venue;
- Structured deposits;
- Money market instruments; and
- Other Non-Complex Products that meet certain criteria, including having frequent opportunities to trade at publicly available prices, do not involve potential liability that exceeds the original investment, do not include exit charges that have the effect of making the investment illiquid and where adequate comprehensive information on the investment is publicly available and likely to be readily understood by the average retail client.

Complex Products are therefore anything that is outside of the above definition of Non-Complex. Specifically, Complex Products are anything involving derivatives or where the opportunity to sell is infrequent. This will include:

- Structured Products;
- Units/shares in some Non-UCITS Retail Schemes (NURS) (this will depend on the individual fund); and
- Futures and Options.

If you are investing without having received financial advice and are unsure if your proposed investment is a Complex Product, please ask the provider of your investment.

If you are investing in a Non-Complex Product without having received financial advice, please note that we will not assess whether the proposed investment is appropriate for you.

---

## Arranging investments

The James Hay Partnership SIPP allows a wide variety of investments to be arranged. These notes provide some general guidance, but cannot include all situations, as these are too diverse to be covered by one document.

If you require any assistance with arranging an investment please contact us or your financial adviser.

---

## Deposit Accounts

The account must be with a UK authorised deposit taker, such as a UK bank or building society. The account must be in the name of both James Hay Pension Trustees Limited (JHPT) and the member as co-trustee.

It is mandatory that both the member and JHPT are joint signatories.

**For example, as the member and JHPT are both Trustees of the Partnership SIPP, all transactions must be authorised by both parties. The account name will therefore be “James Hay Pension Trustees Limited - member name”.**

The member will need to complete the application form accordingly, and forward it to us for signing and returning/sending on. The initial deposit can be made either by cheque, Faster Payments or CHAPS<sup>3</sup> transfer. This is arranged by us once the account details are known.

Statements must be issued to both James Hay Partnership and the member. If the deposit taker will only issue statements to one address, these must be sent to James Hay Partnership.

<sup>3</sup> CHAPS payments will be charged at £15 each.

## Equities, Investment Trusts, Fixed Interest Securities, Warrants, PIBS, Futures, Options.

These must be purchased via an investment manager or stockbroker. You can choose which investment manager or stockbroker the SIPP will open an account with, as long as the relevant firm is appropriately regulated by the FCA in the UK to undertake that type of investment business.

If you open an investment management account, this can be on an advisory, discretionary or execution only basis. The account must be in the name of JHPT and the member as co-trustee; "James Hay Pension Trustees Limited - member name". It is mandatory that both JHPT and the member are joint signatories.

**For example, a member has a James Hay Partnership SIPP, and both JHPT and the member are trustees. Transactions can be authorised by the member alone, provided the proceeds from any sales are either paid to:**

- **the investment manager/stockbroker account in the name of JHPT and the co-trustee,**
- **the SIPP Bank Account, or**
- **another account opened for the SIPP in the name of JHPT and the co-trustee, where JHPT is a co-signatory on the account.**

You will need to complete the investment manager's/stockbroker's application form and forward it to us for signing and returning/sending on.

Portfolio valuations should be sent to James Hay Partnership and the member. If the investment manager/stockbroker will only send these to one address, these must be sent to James Hay Partnership.

---

## Unit Trusts, Open-Ended Investment Companies (OEICs), Undertakings for Collective Investments in Transferable Securities (UCITS).

These can be accessed directly from the fund manager, or via a fund supermarket or other platform.

In either case, the application form must be completed in the name of both JHPT and the member as Trustees of the SIPP. It is mandatory that both the member and JHPT are joint signatories.

**For example, a member has a James Hay Partnership SIPP and both JHPT and the member are trustees. Transactions can be authorised by the member alone, provided the proceeds from any sales are paid to the SIPP Bank Account.**

You will need to complete the application form and forward it to us for signing and returning/sending on.

The investment can be made either by cheque, Faster Payments or CHAPS<sup>3</sup>. This is arranged by us once the application form is complete.

Statements must be issued to James Hay Partnership and the member. If the fund manager/platform manager will only issue statements to one address, these must be sent to James Hay Partnership.

<sup>3</sup> CHAPS payments will be charged at £15 each.

---

## Insurance Company Managed Funds

A member has a James Hay Partnership SIPP and both JHPT and the member are trustees. The application form must be completed in the name of both JHPT and the member as trustees; "James Hay Pension Trustees Limited - member name". It is mandatory that both JHPT and the member are joint signatories.

**For example, a member has a James Hay Partnership SIPP and both JHPT and the member are trustees. The member's transactions must be authorised by both parties. You will need to complete the application form and forward it to us for signing and returning/sending on.**

The investment can be made either by cheque, Faster Payments or CHAPS<sup>3</sup>. This is arranged by us once the application form is complete.

Statements must be issued to James Hay Partnership and the member. If the insurance company will only issue statements to one address, these must be sent to James Hay Partnership.

<sup>3</sup> CHAPS payments will be charged at £15 each.

## Property

Property purchases can be time consuming and complex. Therefore, once you have identified a property you wish to purchase, please contact the Service Executive Team who will send a Property

Questionnaire in order to determine if the property is an allowable investment under HM Revenue & Customs (HMRC) regulations.

---

## Important notes

James Hay Partnership does not accept any liability or responsibility for investment decisions made by the member or their adviser(s). James Hay Partnership is not regulated to provide investment advice, and will not assess whether any investment is appropriate for the member. The pension scheme documents (which include trust deeds and rules and contractual terms and conditions) indemnify James Hay Partnership and limit the liability of the scheme providers, trustees and administrators.

However, James Hay Partnership reserves the right to apply additional charges on a time/cost basis, should the amount of work involved exceed that covered by the annual charge. The member will be notified in advance wherever possible, should this become necessary.

This guideline is based on our understanding of current law and HMRC practice, which are subject to alteration.

In most cases, there are no additional James Hay Partnership charges for arranging the purchase and sale of investments although any third parties executing transactions may apply their own charges.

Borrowing is only permitted in connection with a commercial property purchase – please refer to the Commercial Property Purchase and Maintenance Guide or contact our Property Team for more details.

**We are able to provide literature in alternative formats. For a Braille, large print, audio or E-text version of this document call us on 03455 212 414 (or via the Typetalk service on 18001 03455 212 414).**

James Hay Partnership is the trading name of James Hay Services Limited (JHS) (registered in Jersey number 77318); IPS Pensions Limited (IPS) (registered in England number 2601833); James Hay Administration Company Limited (JHAC) (registered in England number 4068398); James Hay Pension Trustees Limited (JHPT) (registered in England number 1435887); James Hay Wrap Managers Limited (JHWM) (registered in England number 4773695); James Hay Wrap Nominee Company Limited (JHWNC) (registered in England number 7259308); PAL Trustees Limited (PAL) (registered in England number 1666419); Santhouse Pensioner Trustee Company Limited (SPTCL) (registered in England number 1670940); Sarum Trustees Limited (SarumTL) (registered in England number 1003681); Sealgrove Trustees Limited (STL) (registered in England number 1444964); The IPS Partnership Plc (IPS Plc) (registered in England number 1458445); Union Pension Trustees Limited (UPT) (registered in England number 2634371) and Union Pensions Trustees (London) Limited (UPTL) (registered in England number 1739546). JHS has its registered office at 2nd Floor, Gaspé House, 66-72 Esplanade, St Helier, Jersey, JE1 1GH. IPS, JHAC, JHPT, JHWM, JHWNC, SPTCL, SarumTL, IPS Plc, PAL, STL, UPT and UPTL have their registered office at Dunn's House, St Paul's Road, Salisbury, SP2 7BF. JHAC, JHWM, IPS and IPS Plc are authorised and regulated by the Financial Conduct Authority. The provision of Small Self Administered Schemes (SSAS) and trustee and/or administration services for SSAS are not regulated by the FCA. Therefore, IPS and IPS Plc are not regulated by the FCA in relation to these schemes or services. (04/19)