

Investment Guidelines

The Isle of Man pension schemes offered by Momentum Pensions Limited can hold many different types of investments, subject to applicable regulatory investment restrictions and the following Investment Guidelines adopted by the Trustee:

- The Members portfolio must be constructed in a manner, which takes into account the underlying Members attitude to risk, assessed by considering the total risk and diversification of the Members portfolio as a whole.
- Collective investment scheme(s) ("CIS") or fund(s) are acceptable, provided when using a look through approach, the CIS or fund(s) within the portfolio as a whole, has a number of underlying investments or funds which are themselves diversified by sector and/or geographically in a way to avoid accumulations of risk in the portfolio as a whole. Investment in a single fund may be considered where the above requirements are met.
- Individual corporate/government bond(s) or equities are acceptable provided that no more than 10% of the Members total portfolio value will be invested in any such individual investment, with the permitted percentage being based on the portfolio value at the time of receipt of the investment instruction.
- No private funds or private company shares, including shares in a company where the Member, or a related person is a controlling shareholder.
- No direct immovable property assets are permitted.
- Derivative products or instruments for speculative purposes are not permitted, aside from those used within a CIS or fund(s) (excluding hedge funds or highly leveraged funds), or within existing structured products, which provide a level of underlying guarantees.
- Direct crypto-currency investments or collective investment schemes or funds heavily invested in crypto currency or cannabidiol or similar are not permitted. Additionally direct holdings of commodities are not acceptable.
- Fixed deposit interest account(s) may be acceptable, provided that the option to break-out of the fixed term is evidenced when submitting the instruction and the Member is aware a break-out penalty may apply. For short term fixed interest deposits where an early break-out option is not available, a maximum of 40% of the Members Portfolio will typically be considered.

Additional requirements

- Investments must be classified as suitable for a retail individual.
- For the purposes of ensuring the Members portfolio is diversified, the portfolio as whole should be constructed to avoid exposure to any single asset (excluding a CIS or Fund), sector or region.
- All new investment purchase instructions must be for clean investments.
- Acceptance or rejection of an investment is at the discretion of the Trustees, having carried out a reasonable assessment.

Important to Note

The Scheme Investment Policy can be found in the Scheme Particulars.

The Member has responsibility for directing how their Scheme benefits are invested. Members may duly appoint an Adviser and/or Discretionary Fund Manager (“DFM”) to assist them when directing their investments.

Members and their appointed Adviser and/or DFM must ensure that all investments instructed are in line with the above Investment Guidelines.

Members should be aware that the value of investment can fall as well as rise and are not guaranteed. Past performance is no guide to future performance.

The Trustees strongly recommend regular ongoing investment review meetings are held by Members with their appointed Adviser and/or DFM each year to review their investment portfolio. This is to ensure the Member can monitor the performance of their portfolio on an ongoing basis and to ensure the investment portfolio remains aligned to the Members retirement goals and risk profile. Ensuring such review meetings occur regularly is the responsibility of the Member and their appointed Adviser/DFM to arrange. The Trustee or Administrator does not accept any liability for any impact on a Member’s portfolio or performance of the portfolio by failing to hold regular investment review meetings or failing to take any action required over this time.

We encourage Members to monitor their investment portfolios including the individual investment values and all investment transactions, on an ongoing basis by:

- Accessing the Member’s Investment Provider online investment portal, which typically provides current valuation and portfolio transaction statements.
- Requesting a valuation statement and transaction statement from their Adviser/DFM or from us directly.

These Investment Guidelines do not override any additional legal requirement imposed on the promoter of an investment or Adviser/DFM, regarding any contractual requirement or any client classification rules imposed under law or regulation in the jurisdiction of the investment product manufacturer/fund manager and/or under the Member’s current jurisdiction at the time of promotion and/or investment. It is the responsibility of the Member and their appointed Investment Adviser/DFM to ensure any such requirement(s) are fully met before directing any investment.