BLACKFINCH
ASSET MANAGEMENT

Open Product Annual Assessment

Blackfinch Asset Management
Managed Portfolio Service and
Tailored Portfolio Service

Contents

Clarifications and Assumptions

Blackfinch Managed Portfolio Service (MPS)

Each model portfolio on pages 4-5 represent a sample MPS objective.

[1]Please note, expected volatility is expressed as the annualised standard deviation of monthly returns for each individual portfolio over the specified time.

There is no guarantee that this will be achieved and the portfolios are not managed on this basis. Rather, this provides an approximation for the proposed risk of each service. Volatility data as of 31/05/2026.

Blackfinch Tailored Portfolio Service (TPS)

Each model portfolio on pages 6-7 represent a sample TPS objective.

Volatility bandings are calculated using Defaqto's methodology.

[2]Please note, expected volatility is expressed as the annualised standard deviation of monthly returns for each individual portfolio over the specified time.

There is no guarantee that this will be achieved and the portfolios are not managed on this basis. Rather, this provides an approximation for the proposed risk of each service. Volatility data as of 31/05/2026.

	Investor type	Clients' knowledge and experience	Clients' ability to bear loss	Investment horizon	Expected Volatility (5 years)[1]	Expected Volatility (10 years)
Blackfinch MPS **Defensive Portfolio**	Retail Clients, and; Professional Clients	Clients must have a basic knowledge and experience of investment markets and the characteristics of a multi-asset investment portfolio, and; accept the risks and benefits of long term investment in capital markets, and; investors should have no immediate need to access their investment and be comfortable with committing their capital over the longer term.	Clients must be prepared to bear losses of up to 100%.	Those who are looking to invest in capital markets over the medium to long term (typically 5 years+) to achieve a total return above a stated benchmark.	6-8%	5-7%
Blackfinch MPS **Cautious Portfolio**					7-9%	6-8%
Blackfinch MPS **Balanced Portfolio**					8-10%	7-9%
Blackfinch MPS **Growth Portfolio**					9-11%	8-10%
Blackfinch MPS **Enhanced Growth Portfolio**					10-12%	9-11%

Client needs and objectives

The portfolio may be suitable for investors looking to invest in capital markets over a medium to long-term (5+ years) investment horizon, with returns above the Investment Association (IA) 0-35% Shares benchmark.

The portfolio is constructed with a low risk tolerance in mind, and is globally diversified and contains multi asset investments including fixed income, equities, property, alternatives and cash.

Client needs and objectives

The portfolio may be suitable for investors looking to invest in capital markets over a medium to long-term (5+ years) investment horizon, with returns above the Investment Association (IA) 20-60% Shares benchmark.

The portfolio is constructed with a lowest-medium risk tolerance in mind, and is globally diversified and contains multi asset investments including fixed income, equities, property, alternatives and cash.

Client needs and objectives

The portfolio may be suitable for investors looking to invest in capital markets over a medium to long-term (5+ years) investment horizon, with returns above the Investment Association (IA) 20-60% Shares benchmark.

The portfolio is constructed with a low-medium risk tolerance in mind, and is globally diversified and contains multi asset investments including fixed income, equities, property, alternatives and cash.

Client needs and objectives

The portfolio may be suitable for investors looking to invest in capital markets over a medium to long-term (5+ years) investment horizon, with returns above the Investment Association (IA) 40-85% Shares benchmark.

The portfolio is constructed with a high-medium risk tolerance in mind, and is globally diversified and contains multi asset investments including fixed income, equities, property, alternatives and cash.

Client needs and objectives

The portfolio may be suitable for investors looking to invest in capital markets over a medium to long-term (5+ years) investment horizon, with returns above the Investment Association (IA) 40-85% Shares benchmark.

The portfolio is constructed with a highest-medium risk tolerance in mind, and is globally diversified and contains multi asset investments including fixed income, equities, property, alternatives and cash.

Signatory of: PRI Principles for Responsible Investment

As a UN PRI signatory, responsible investing is implemented through a positive screening approach whereby investments are not solely excluded based on the sector in which they operate. There is no guarantee that the objective will be met or that a positive return will be delivered over any time period. Capital at risk.

Distribution strategy

Investment advice, and; Investment management

Characteristics and objectives to be deemed unsuitable

Those who may want to access a significant portion of their invested capital in the short-term

- Those who have a very low appetite of risk
- Inexperienced investors who have not received financial advice
- Those with insufficient liquid short-term funds to cover potential emergencies
- Those looking to invest capital in a risk-free asset class
- Those looking to invest capital in to a high risk/ high return strategy
- Those looking to invest with a 'negative screening' approach to Responsible investing

	Investor type	Clients' knowledge and experience	Clients' ability to bear loss	Investment horizon	
Blackfinch Example TPS **Risk Level 3 Portfolio**	Retail Clients, and; Professional Clients	Clients must have a basic knowledge and experience of investment markets and the characteristics of a multi-asset investment portfolio, and; accept the risks and benefits of long term investment in capital markets, and; investors should have no immediate need to access their investment and be comfortable with committing their capital over the longer term.	Clients must be prepared to bear losses of up to 100%.	Those who are looking to invest in capital markets over the medium to long term (typically 5 years+) to achieve a total return above a stated benchmark.	**Expected Volatility (5 years)**[2] 4.7% - 8.3%
Blackfinch Example TPS **Risk Level 4 Portfolio**					**Expected Volatility (5 years)**[2] 6.5% - 10%
Blackfinch Example TPS **Risk Level 5 Portfolio**					**Expected Volatility (5 years)**[2] 8.3% - 11.8%
Blackfinch Example TPS **Risk Level 6 Portfolio**					**Expected Volatility (5 years)**[2] 10% - 13.6%
Blackfinch Example TPS **Risk Level 7 Portfolio**					**Expected Volatility (5 years)**[2] 11.8% - 15.4%

Client needs and objectives

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Client needs and objectives

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The portfolio is constructed with a highest-medium risk tolerance in mind, and is globally diversified and contains multi asset investments including fixed income, equities, property, alternatives and cash.

Signatory of: PRI PRINCIPLES FOR RESPONSIBLE INVESTMENT

As a UN PRI signatory, responsible investing is implemented through a positive screening approach whereby investments are not solely excluded based on the sector in which they operate. There is no guarantee that the objective will be met or that a positive return will be delivered over any time period. Capital at risk.

Distribution strategy

Investment advice, and; Investment management

Characteristics and objectives to be deemed unsuitable

Those who may want to access a significant portion of their invested capital in the short-term

- Those who have a very low appetite of risk
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- Those looking to invest capital in a risk-free asset class
- Those looking to invest capital in to a high risk/ high return strategy
- Those looking to invest with a ‘negative screening’ approach to Responsible investing

Value Market Assesment

Review completed by: Josh Clayton MCSI, Assistant Portfolio Manager

Date completed: 03/06/2026

Product Details

Has the description of the product, key features, objectives, benefits or limitations changed since the last review?

The product range now consists solely of the Blackfinch Managed Portfolio Service (MPS) and Tailored Portfolio Service (TPS). Both solutions provide professionally managed, risk-rated portfolios constructed using collective investment vehicles and overseen by the Blackfinch Investment Team. The MPS provides a range of model portfolios aligned to differing risk profiles, whilst the TPS allows portfolios to be tailored to the requirements of adviser firms and their underlying client bases. There have been no changes to the core investment objectives, target market or overall proposition since the previous review.

If yes, please explain the differences, confirm if this will have an effect on the target market for the product [including vulnerable customers].

References to the legacy Multi-Asset Fund range have been removed following completion of the closure process. The review confirmed that the target market remains unchanged and continues to comprise retail and professional clients receiving investment advice from authorised financial advisers. No adverse impact on customer outcomes has been identified.

Have the risks changed since the last review?

No. An annual review of the product proposition, investment process, governance framework and target market has been completed. No material changes to the risks associated with the MPS or TPS have been identified.

Product Details

Continued

If yes, please explain the differences, including the risks posed to the target market and vulnerable customers and how these risks are mitigated.	Not applicable. No material changes in product risks were identified during the review period.
Do the changes affect the aspects/limitations of the product and prevent the average target customer from fully enjoying the product?	No. The review concluded that the existing product structure, investment approach and service model continue to meet the needs of the identified target market. No additional barriers or limitations impacting customer outcomes were identified.
Have the changes affected the ease of switching to another provider or product?	No. There have been no changes to the process for transferring assets, withdrawing investments or switching to alternative solutions. The review identified no material barriers that would prevent customers from changing provider or product where appropriate.

Costs

Have the costs of the product changed since the last review?

No changes have been made to the MPS or TPS annual management charge during the review period. The MPS continues to operate with an annual management charge of 0.25%, whilst TPS charges continue to be determined on a case-by-case basis based upon commercial terms agreed with Blackfinch and the Financial Adviser firm – typical determinants include, but are not limited to, portfolio complexity and servicing requirements.

If yes, please explain the differences:

Not applicable.

Have the non-financial costs of the product changed since the last review?

As part of the annual Consumer Duty review, Blackfinch conducted a fair value assessment of the MPS and TPS propositions. This included reviewing comparable solutions available within the market, adviser feedback, portfolio performance, investment oversight, governance arrangements, reporting capabilities and underlying fund costs. The review concluded that the charges remain reasonable and proportionate to the benefits delivered and continue to represent fair value for clients..

More specifically, the review identified no additional non-financial costs, barriers or administrative burdens that would negatively impact customer outcomes or reduce the accessibility of the products.

Cost

Continued

If yes, please explain the differences:	Not applicable.
Have the manufacturing costs of the product changed?	No. No material changes to the costs associated with the design, management or oversight of the products were identified during the review.
If yes, please explain the differences	Not applicable.

Target Market

Has the target market (including their characteristics) and the reason why this target market was selected changed since the last review?	No. An annual review of the target market has been completed. The MPS and TPS continue to be designed for retail and professional clients receiving investment advice from authorised financial advisers. The review confirmed that the target market remains appropriate and that the products continue to meet the needs, objectives and characteristics of the intended client groups. No material changes to the target market were identified during the review period.
If yes, please explain the differences:	Not applicable.
Have any changes occurred in the characteristics or drivers of vulnerability within the target market?	No. Ongoing monitoring has not identified any material changes in the characteristics or drivers of vulnerability within the target market. Vulnerable customers remain a consideration within adviser suitability processes and ongoing servicing arrangements.
If yes, please explain the differences and how these vulnerabilities could impact full/value use of the product:	Not applicable.
Do cognitive or behavioural biases of customers impact on the value of the product to the customer? *If yes, please explain.*	No. Certain behavioural biases, including short-term performance focus, loss aversion and market timing decisions, could potentially impact customer outcomes. These risks are mitigated through the advised distribution model, ongoing suitability assessments, regular portfolio reviews, adviser engagement and clear communication regarding investment objectives, risks and expected investment time horizons. The review concluded that these controls remain appropriate and effective.

Consumer Support

Have we changed the way we provide consumer support on this product?

No. An assessment of consumer support arrangements has been completed, and no material changes have been made during the review period. Clients continue to receive support through their financial adviser, supported by Blackfinch operational, investment and relationship management teams where appropriate.

Support within Investment Operations consists of maintaining and developing a wide range of Platform relationships to ensure the smooth running of portfolios and reacting to change requests, rebalance, and set up of new portfolios. Also, the compiling of monthly fund fact sheets and Quarterly Investment Reports to support the business

If yes, please explain the differences, confirming if this needs the customers' needs (including vulnerable customers) and that it gives retail customers sufficient opportunity to understand and assess their options, including any risks

Not applicable. The review confirmed that existing support arrangements remain appropriate for the target market and continue to provide customers with sufficient opportunity to understand their options, access relevant information and make informed decisions.

This directly references the Consumer Understanding and Consumer Support outcomes.

Distribution Arrangements

Have the distribution channels changed since the last review?

No. The MPS and TPS continue to be distributed through authorised financial advisers. The distribution strategy remains appropriate for the target market, as clients access the products through an advised process where suitability is assessed by the adviser. No changes have been made to the distribution channels during the review period.

If yes, please explain the differences and if this is consistent with the value of the product and how it supports the value.

Not applicable. No changes have been made to the distribution arrangements during the review period. The existing advised distribution model remains consistent with the value of the product and supports good customer outcomes by ensuring clients receive regulated advice before investing.

Does the distributor have access to all appropriate information from the manufacturer to be able to understand the value that the product is intended to provide for the customer?

Yes. Blackfinch provides advisers with appropriate pre-sale and post-sale information, including product literature, portfolio information, target market details, cost and charges information, performance reporting, investment commentary and ongoing access to the Blackfinch Investment team. This enables distributors to understand the product, assess suitability, explain the intended value to clients and support good customer outcomes throughout the relationship.

Comparison & Value Assessment

Has a comparison of other products in the market been performed?	Yes. As part of the annual Consumer Duty review, Blackfinch has undertaken a comparison against comparable discretionary managed portfolio and tailored portfolio solutions available within the UK market. The review considered product structure, investment approach, governance framework, portfolio oversight, service proposition, performance characteristics and overall costs to ensure the products continue to deliver fair value to clients.
Identify the market rate for the product	The market rate has been assessed through comparison with a peer group of comparable discretionary managed portfolio services and tailored investment solutions operating within the UK advised market. The review considered annual management charges, underlying fund costs, transaction costs and the overall service proposition to determine whether the products remain competitively priced and represent fair value.
Is the final price paid by the customer significantly higher than either the total cost for manufacturing and distribution or above the market rate? If so, is there an added benefit to the service which means the customer is receiving fair value?	No. The annual review concluded that the total cost incurred by clients remains consistent with comparable solutions available in the market. In assessing fair value, Blackfinch considered the investment management expertise provided, ongoing portfolio monitoring, governance arrangements, risk oversight, adviser support, reporting capabilities and underlying fund selection process. The review concluded that the benefits delivered to clients remain proportionate to the costs incurred and that the products continue to represent fair value. In addition, independent benchmarking exercises and market comparisons have been undertaken to review annual management charges, underlying fund costs, transaction costs and overall client outcomes. No evidence was identified to suggest customers are paying charges which are disproportionate to the value received.

Comparison & Value Assessment

Continued

If differential pricing is used has the objectives or reasons for this changed since the last review?	Not applicable. Differential pricing is not applied within the Managed Portfolio Service. Tailored Portfolio Service pricing remains subject to individual commercial agreements reflecting the bespoke nature of the service and has not materially changed during the review period.
If yes, please explain the differences	Not applicable.

Testing

Is the product meeting the needs and objectives of its target market and vulnerable customers?

Yes. Ongoing monitoring and annual review indicate that the MPS and TPS continue to meet the needs, characteristics and objectives of their target market. Portfolio outcomes remain consistent with the stated investment objectives, risk parameters and target market requirements. Product governance reviews, performance monitoring, adviser feedback and customer outcome assessments have not identified any material concerns regarding customer outcomes, including those relating to vulnerable customers.

Has the product been distributed in accordance with the value assessment findings?

Yes. The products continue to be distributed through authorised financial advisers operating within the advised market. Distribution arrangements remain aligned with the target market and fair value assessment. Blackfinch provides distributors with sufficient information regarding product design, target market, risks, costs and intended value to support appropriate distribution and customer outcomes.

Are communications being used as detailed within the product approval?

Yes. Product communications continue to be provided in accordance with the approved product governance framework. Blackfinch regularly reviews client-facing and adviser-facing materials to ensure they remain clear, fair and not misleading. No material issues have been identified during the review period.

Testing

Continued

Does data demonstrate the communications are effective in allowing the target market to understand the key features and benefits of the product and make effective decisions?	Yes. Blackfinch has undertaken Consumer Understanding Reviews across the MPS and TPS propositions. These reviews assessed whether communications enable advisers and end investors to understand the product objectives, risks, costs and expected outcomes. No material concerns were identified, and the review concluded that communications continue to support informed decision-making.
Are customers adequately supported after the point of sale?	Yes. Customers continue to receive ongoing support through their financial adviser, supplemented by Blackfinch's investment, relationship management and operational teams where appropriate. Investors receive regular portfolio reporting, investment commentary, factsheets and access to information regarding portfolio activity and performance. The review concluded that customers continue to receive sufficient support throughout the lifecycle of the product.
Are there any unreasonable post sales barriers? If yes, when are these barriers in the lifecycle of the product	No. The review did not identify any unreasonable post-sale barriers which would prevent customers from accessing information, making changes to their investment arrangements, transferring assets or exiting the product where appropriate. Existing processes continue to support good customer outcomes.
Have testing of the actions of distributors been undertaken?	No formal distributor testing programme has been undertaken during the review period. However, Blackfinch maintains regular engagement with adviser firms and distributors, reviews feedback received through relationship management activity and monitors customer outcomes to identify any potential concerns regarding distribution practices.

Findings

Is the product demonstrating a clear set of benefits for its target market [including vulnerable customers]

Yes. The review concluded that the MPS and TPS continue to provide a clear and identifiable set of benefits to their target market. These include professional discretionary portfolio management, ongoing investment oversight, risk-managed portfolio construction, access to diversified investment solutions and regular investment reporting. The review found that these benefits remain accessible to both the wider target market and vulnerable customers, with no evidence of differential outcomes being identified.

Does the product in its current form offer fair value?

Yes. Following assessment of product costs, market comparisons, investment outcomes, governance arrangements, customer support and the overall service proposition, the review concluded that the MPS and TPS continue to provide fair value to customers. The benefits delivered remain proportionate to the total costs incurred by investors.

Have customers been able to use the full benefits of the product?

Yes. The review identified no material barriers preventing customers from accessing the benefits of the MPS or TPS. Customers continue to receive the intended investment management service, portfolio reporting, adviser support and access to their investments in line with product expectations.

Findings

Continued

Explain why the product continues to provide value for the target market and also for vulnerable customers in the target market.

Taking into consideration the findings of this review, Blackfinch believes the MPS and TPS continue to provide good outcomes and fair value for their target market, including vulnerable customers. The products remain aligned to their stated objectives, target market and risk parameters, whilst benefiting from ongoing portfolio management, investment oversight, governance monitoring and adviser support.

The review considered product performance, risk characteristics, customer support arrangements, consumer understanding assessments, distribution arrangements, complaints data, adviser feedback and fair value analysis. No material concerns were identified that would suggest customers are receiving poor outcomes or that the products are failing to meet their intended objectives.

The products continue to be distributed through an advised model, helping to mitigate risks associated with customer vulnerability, behavioural biases and investment decision-making. Blackfinch therefore concludes that the MPS and TPS remain appropriate for their intended target market and continue to represent fair value.

Is the product allowing customers to pursue their financial objectives?

Yes. The products continue to support customers in pursuing their long-term financial objectives through professionally managed, diversified investment portfolios aligned to differing risk profiles and investment requirements. The review identified no concerns regarding the products' ability to support intended customer outcomes.

Findings

Continued

Have identified risks of the product been reasonably mitigated and distribution strategies designed to significantly reduce such risks?	Yes. Product risks remain clearly identified and are managed through the investment process, governance framework, ongoing portfolio monitoring, diversification requirements, platform custody arrangements and the advised distribution model. The review concluded that appropriate controls remain in place to mitigate foreseeable harm and support good customer outcomes.
Is the product design avoiding foreseeable harm as set out in PRIN 2A.2.10 G?	Yes. The annual review concluded that the products continue to be designed, managed and distributed in a manner consistent with the Consumer Duty requirements regarding foreseeable harm. No material concerns were identified during the review period.
Are there any adverse findings in this assessment?	No. The review identified no material adverse findings requiring remediation, product redesign, changes to target market definition or amendments to distribution arrangements. Additionally, no evidence was identified during the review period to suggest that customers, including vulnerable customers, are receiving outcomes that fall below those reasonably expected under the Consumer Duty.
If any adverse findings identified, set out mitigating actions or remedial action to prevent foreseeable harms to current and new customers.	Not applicable.

IMPORTANT INFORMATION