

## Our approach to meeting the Products & Services Outcome and Price & Value Outcome – Information for distributors of the Product.

This summary document is being provided to you to fulfil our responsibilities under PRIN 2A.4.15R and PRIN 2A.3.12 R (2).

It is designed to support you to comply with your responsibilities under PRIN 2A.3.16 R and PRIN 2A.4.16 R. Please note that you are ultimately responsible for meeting your obligations under 'The Consumer Duty'.

This information is intended for intermediary use only and should not be provided to customers.

### 1. Summary of our assessment

We have assessed that:

- Our **Second Charge Residential and Second Charge Consumer Buy to Let** product range continues to meet the needs, characteristics, and objectives of customers in the identified target market.
- The intended distribution strategy remains appropriate for the target market.
- The product range provides fair value to customers in the target market (i.e. the total benefits are proportionate to total costs).

### 2. Product characteristics & benefits

The products are designed to meet the needs of the target group, most notably the need to raise capital against residential or let property located in England, Wales and Scotland (residential only) for a variety of loan purposes. Consumer buy to let customers must have no other buy to let properties and the ultimate beneficial owner must not be a special purpose vehicle. More specifically, the consumer buy to let range targets customers seeking to raise capital against property which has been:

- acquired through any means other than purchase e.g. inherited.
- lived in by the borrower(s) or related persons since purchase.
- lived in and is now to be let.

The product range features and criteria are designed to support these needs.

Product Characteristics	Benefits
Fixed rate products.	Payment stability for a predetermined period.
Tracker rate products.	Generally, but not always lower interest rates (vs. fixed rates) and payment amounts. Lower, or no, exit costs (vs. fixed rates).
Mortgage Term up to 30 years.	Able to spread repayment over longer period to reduce monthly repayments.
Repayment and interest only.	Options to suit circumstances and repayment preferences where appropriate.
LTI over 6 times income.	Maximise affordable borrowing potential.
Complex incomes.	Allows customers with harder to understand incomes, who may otherwise be excluded because of their circumstances, to access mortgage finance and achieve their financial objectives.
No minimum credit score; adverse credit information.	Enables customers with a less than perfect credit history, who may be or have been rejected by high street lenders, to achieve their financial objectives.
Capital raise for any legal purpose.	Enables customers to release equity for a wide variety of purposes, to enable them to achieve their financial objectives.
Maximum age at end of term 85.	Allows longer term / lower monthly repayments and/or enables older customers to borrow when they would otherwise be excluded.

Full eligibility criteria can be accessed on our intermediary website via this link:

<https://www.westoneloans.co.uk/second-charge-mortgages#products>

### 3. Target market assessment and distribution strategy

This target market assessment matrix segments the target customers for the product range, recognising their different needs to enable you to tailor the services you provide when you distribute the product range.

Customer Circumstances	Distribution Strategy	Customer Needs & Objectives
<p>Unable to raise the capital they need via unsecured lending or a further advance with their existing first mortgage provider.</p> <p>Prefer to not disturb their existing first mortgage to avoid an early repayment charge and / or losing a preferential rate.</p> <p>Complex incomes including the self-employed.</p> <p>Recent and/or historic blemishes on their credit file.</p> <p>Been subject to a life event which materially impacted their credit rating.</p> <p>Older, including those who require borrowing past retirement age.</p> <p>Raise capital for a variety of reasons including debt consolidation and home improvements.</p>	<p>Only available through intermediary channels.</p> <p>Only available through advised sale.</p>	<p>Raise capital, including to consolidate debt to reduced outgoings.</p> <p>Fix costs for a defined period.</p> <p>Repay the capital by the end of the mortgage term.</p> <p>Access to higher LTI lending.</p>
<p>We only distribute our Product Range through the following financial intermediaries:</p> <ul style="list-style-type: none"> <li>Second charge packagers and specialist distributors (also referred to as master brokers).</li> </ul> <p>All intermediaries must be registered with us.</p>		

The product range is not designed for customers who want the ability to:

- Port the mortgage to another property.
- Switch the mortgage during the term of the loan.
- Overpay more than 10% per annum without incurring early repayment charges during the fixed period.
- Borrow on a part capital repayment and part interest only basis.

### 4. Customers with characteristics of vulnerability

The product range is designed for a market segment underserved by high street lenders, including those who wish to consolidate debt, which is likely to include some customers with characteristics of vulnerability or who will experience vulnerability over time.

Such customers are less likely to have a comprehensive understanding of mortgages or the mortgage market. Therefore, they may require additional advice and support to ensure they understand the information being presented to them and the implications of the arrangement they are entering into to reduce the risk of harm occurring.

We considered the needs, characteristics, and objectives of customers with characteristics of vulnerability at all stages of the design process for this product range to ensure it meets their needs.

We have also tested the product range to assess whether it will meet the identified needs, characteristics, and objectives of the target market, including customers in the target market who have characteristics of vulnerability.

We have in place a framework to achieve good outcomes for vulnerable customers, which includes:

- The requirement for all customers to receive independent mortgage and, where appropriate, debt consolidation advice from an appropriately qualified mortgage advisor.
- Education and training for our staff to ensure they have the appropriate skills and experience to recognise and respond to the needs of vulnerable customers.
- A clearly defined lending policy that dictates how affordability is assessed to ensure all customers enter our lending products with sufficient means to repay the debt, which in the case of interest only loans, incorporates evidencing a plausible repayment vehicle.
- Flexible policies, where appropriate, to support vulnerable customers.
- Monitoring to ensure we continue to meet and respond to the needs of customers with characteristics of vulnerability.

Intermediaries should continue to comply with your obligations to ensure that you treat customers in vulnerable circumstances fairly.

Please contact us if you need any further information about how we support the needs of all our customers in relation to the product range.

## 5. Our assessment of value

We have developed a comprehensive and robust assessment process which evaluates several aspects of our business to determine the value of our mortgage products. This analysis is used to ascertain whether the product range delivers fair value for customers.

The outcomes of the assessment process are presented to our Product Governance Committee, allowing for challenge and further investigation before we sign-off the outcomes and share the summary of our assessment with you.

Our fair value assessment has considered the following:

Benefits	Price	Costs	Limitations
The range of features that the product range provides, the quality of the product range, the level of customer service that is provided and any other features that the product range may offer.	The interest rates, fees and charges customers pay for the product range, comparable market rates, advice fees paid to intermediaries and non-financial costs associated with operating the product range.	The cost of funding the product range and any other reductions in costs to the customer made possible by economies of scale.	Any limitations on the scope and service we provide or the features of the product range.

## Results of our assessment

Our assessment concluded that our second charge residential and second charge consumer buy to let product range continues to deliver fair value for customers in the target market.