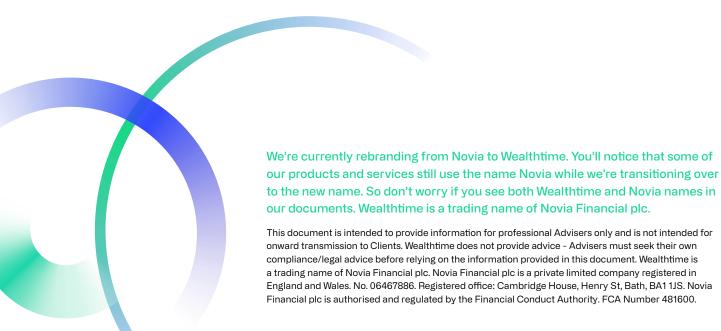


Stocktrade Adviser Guide





Introduction

The Stockbroker Account is offered through our experienced partner, Stocktrade. This is a quick reference guide for Advisers setting up a share dealing account for their Clients. It supports other documents including:

- · Stocktrade Service Guide compiled by Stocktrade to explain how their service works.
- Stocktrade Wrap Member Terms of Service compiled by Stocktrade to detail the terms of the Share Dealing Account for all product wrappers. (Please note that a Stocktrade account is not available with an Offshore Bond).
- Section 7 of the Wealthtime Terms and Conditions also covers share dealing through Stocktrade.
- · Copies of all these documents are available at wealthtime.com/advisers/literature.

Who are Stocktrade and what do they do?

Stocktrade are execution-only stockbrokers. They are part of Alliance Trust Limited and have been appointed by Wealthtime to provide a share dealing service for Clients and their Advisers.

What is a Stockbroker Account?

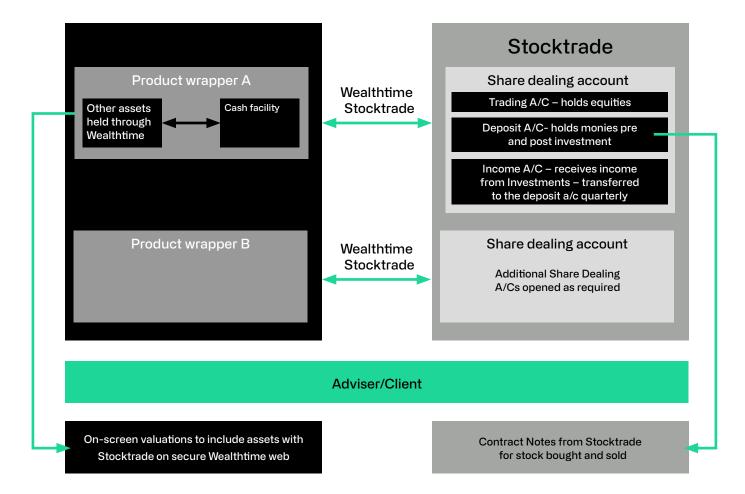
A share dealing account that allows directly traded equities to be included in Client portfolios, if the investment is not available to trade through the Wealthtime platform. With valuations updated daily on Wealthtime online valuation views. Through the account, sterling denominated stock traded on the London Stock Exchange (subject to any trading or wrapper restrictions imposed) may be bought, sold and held within the permissible product wrappers.

Who can trade?

Trading can be carried out either online or by phone and by either the Client or Adviser depending on what is stated on the product wrapper application form. Only one party can deal per account, however, whoever is not given dealing rights can request view-only access to the account. It is the Advisers' responsibility to ensure that the Client understands the expectations when using the Stocktrade account if the Client is set up to have trading access. Separate Stockbroker accounts will be set up for each product wrapper where equity dealing is required, and each may have a different Adviser and Client dealing or view-only combinations.



Overview Diagram



Opening Wealthtime Stockbroker Accounts

An account can be opened either when a new product wrapper is opened, or within an existing product wrapper. Wealthtime Stockbroker accounts can be set up for the following wrappers:

- General Investment Account (GIA)
- · Stocks and Shares ISA
- · Novia Self-Invested Personal Pension (SIPP) and Novia Group SIPP

Share dealing is not available within the Novia Offshore Bond.



Investment Type

- · Individual (GIA, ISA, SIPP) require a National Insurance number
- · Corporate, Trust, Charity(GIA) require a Legal Entity Identifier(LEI) number.

How is a Stockbroker Account opened and how long does it take?

- The Adviser and Client complete an application form to open a new product wrapper, including the Stockbroker account
 section and generated Stocktrade application form, before sending it to Wealthtime. This will include the details of which
 party is able to deal on the account and the associated login security questions. A percentage of the investment amount is
 defined as Stocktrade Cash as part of the online journey.
- Wealthtime issues a standard new wrapper opening correspondence to the Client or Adviser. This includes confirmation of the funds being moved to the Stockbroker Account.
- Wealthtime initiates the account opening with Stocktrade within one business day of the receipt of the application from the Adviser and Client. Stocktrade then allow two business days to set up the account. When the account is set up, Stocktrade will issue their Wrap Member Terms of Service and account opening email or letter to the dealer.
- Following this, on day four, Wealthtime will make the payment of monies to Stocktrade via CHAPS (at no cost to the Client).

 On day six, Stocktrade will match the funds to the account and the Adviser or Client will be able to trade.
- By day seven, the Client's cash holding will be visible within the Stockbroker Account online. If the Client is paying by cheque for the new wrapper, it will take an additional two business days to open the account.

Existing wrapper opening:

- In order to trade on an existing product wrapper, the Adviser must complete either a switch or top-up application, stating the amount to be transferred to the Stockbroker account and the login details section.
- The account opening process then follows the same process as above.



Summary of the Stockbroker Account Opening Process

Business Days Elapsed	Process Steps – New Product Wrapper
0	App form completed - % of funds for share dealing allocated
2	Wealthtime issues the product wrapper welcome letter and confirms the amount to be moved to Stocktrade. Wealthtime requests Stocktrade to open the account.
4	Stocktrade sends the Wrap Member Terms of Service and other docs. Wealthtime sends monies to Stocktrade.
6	Trades can commence. Please note that prior to the first trade, the account must be 'activated' online.
	Process Steps – Existing Product Wrapper
0	Complete switch or top-up application for each product wrapper where share dealing is required - % of funds for share dealing allocated.
2	Wealthtime confirms amount to be moved to Stocktrade. Wealthtime requests Stocktrade to open account.
4	Stocktrade send Wrap Member Terms of Service and other documents Wealthtime sends monies to Stocktrade.
6	Trades can commence.
	Please note that prior to the first trade, the account must be 'activated' online.

How do I access a Stockbroker Account?

You may trade using the Stockbroker Account either online or via the telephone.

- Online depending on your access rights, you can either deal or view the account online via the Wealthtime
 website. When you open a new Stockbroker Account, you will be sent an activation email. You should follow
 the instructions on this email to activate your online access to the account and then create a unique password
 for yourself. Separate passwords are used for dealing and view-only access. To access your account, you will
 need to log into the Wealthtime extranet and select the Stockbroker Account button to the left of the screen.
 You can then log in using your username and password.
- Telephone to deal over the telephone, dial 0131 240 0400. You will be asked for your Client unique reference number.

Using Stockbroker Accounts

What about usernames and passwords?

Your username and password are unique to you, so it is important they are not shared with others. If you lose your username, please contact Stocktrade as soon as possible so then they can disable the original username and issue a new one. If you have forgotten your password, there is a 'forgotten password' prompt on the Stocktrade home page. Simply select and follow the online instructions.



How do I move money from a Stockbroker Account?

You may request that Wealthtime move money from a Stockbroker Account to the Cash Facility of the Product Wrapper by instructing a switch to the Cash Facility. If you wish to make a withdrawal, you need to complete a Withdrawal Instruction form. The completed form should be returned to Client Services, allowing at least seven business days for the transfer to complete. You and your Client must ensure there are sufficient monies held within the cash in the Stockbroker Account before any request to Wealthtime is made. Wealthtime will then request the amount and Stocktrade will transfer this into the Product Wrapper Cash Facility.

How do I close a Stocktrade Account?

To close a Stocktrade Account, please make a request in writing with a Client signature to Client Services. Please ensure that all Investments are sold as cash before we move any money away from the account. All monies will be transferred to the Cash Facility of the Product Wrapper and the account will be closed. Please allow at least seven business days for the money to be transferred – following this, the account will be closed.

Charges

For the Stockbroker Account charges, please see the Wealthtime Charges Schedule available on our website. There are two types of charge for using an account:

- Standing Charges for a Stocktrade Account will be taken from the cash holding within the account. Standing charges are per account. This will be taken from the Stockbroker Account.
- Dealing Charges will be taken from the value traded within the Stockbroker Account. Further details are available in the Wrap Member Terms of Service, which will be sent to whichever party has dealing rights for the account.

Please note that any standing charges relating to a Stockbroker Account will be levied and taken from the Product Wrapper Cash Facility by Wealthtime, even if no funds are held with Stocktrade.

Tradable Securities

All Investments bought through a Stockbroker Account must be sterling denominated. Information about the types of investment will differ by Product Wrapper and it is yours or your Client's responsibility to ensure that any Investments are made correctly. It is not possible to hold Investments on the Stocktrade Account that are tradable through the main Wealthtime platform. It is the user's responsibility to check the Investments List before deciding to trade through Stocktrade.

You and your Client can only trade and hold equities and other stock exchange traded products using a Stockbroker Account when we can source a price for the Investments via our data provider. If a price cannot be sourced, the nominated dealer may be asked to sell the holding and we will contact you to inform you of this as soon as possible.



Guidelines for Permissable Securities:

Stocks and Shares ISA

Investments in a ISA will be those on the Official List (fca.org.uk/firms/markets/ukla) and those listed on London Stock
 Exchange's AIM can be found at londonstockexchange.com/home/homepage.htm. These are subject to HMRC rules
 which are amended from time to time, accessible at gov.uk/individual-savings-accounts

General Investment Account (GIA)

- Investments in a GIA will be those on the Official List (fca.org.uk/firms/markets/ukla) and those listed on London Stock Exchange's AIM at: londonstockexchange.com
- Exceptions to the above will be OFEX Shares. Due to their specialist nature these will be available via telephone dealing only.

Novia SIPP (including SIPPs within a Group SIPP scheme)

- Investments in a SIPP will be those on the Official List (fca.org.uk/firms/markets/ukla) and those listed on London Stock
 Exchange's AIM at: londonstockexchange.com/home/homepage.htm
- Exceptions to the above will be OFEX Shares. Due to their specialist nature, these will be available via telephone dealing only.

Novia Offshore Bond

Stockbroker Account cannot be opened for a Novia Offshore Bond Product Wrapper.

Complex Investments

Please note that if the nominated dealer for the share dealing account requests Stocktrade to deal in a security deemed to be a 'complex investment', e.g. Warrants/Non-Readily Realisable Investment (NRRI), the dealer will be asked to provide a signed Appropriateness form. You will be able to deal in these instruments by telephone and online.

Queries

If you have questions regarding the Investments within a Stockbroker Account, please contact the client services team. Please note that for guidance on a specific investment, our response time will be three business days. Please also note that whilst an investment may be listed, it can only be purchased if it can be sourced by Stocktrade. To confirm this, you will need to either login to your Stocktrade share dealing account or telephone Stocktrade on 0131 240 0400.



Assistance

If you wish to contact someone regarding the operation of the account, online or through the telephone dealing service, documentation, Corporate Actions or to do with any other aspect of the share dealing service, please contact Stocktrade on 0845 213 4403.

If you wish to contact someone regarding the opening of a Stocktrade Account, the movement of funds to or from Stocktrade, or any other aspect of the Wealthtime service, please contact client services on 0345 680 8000.

Frequently Asked Questions

Q. What if I need a price before I deal?

A. If you're online, a live price will be displayed prior to executing a trade. If you're dealing on the telephone, the dealer will inform you of the price and ask if you wish to proceed before executing the trade.

Q. Can I invest a set amount or do I have to buy a number of shares?

A. You can invest a sum of money or buy a number of shares. Similarly, you can sell a specific number of shares or go up to a required value.

O. What about Corporate Actions?

A. Stocktrade will communicate directly with whoever has dealing rights if Corporate Actions affect the stocks held through a Stockbroker Account. Wealthtime is not responsible for the information regarding this and if you have any queries, you should contact Stocktrade directly. Further details of how Stocktrade handle Corporate Actions can be found in the Wrap Member Terms of Service.

O. What happens to dividends and other distributions?

A. Distributions, such as dividends, will be paid automatically on a quarterly basis to the Client's income account within their share dealing account. This cash will be reflected in their Product Wrapper valuation. If there is sufficient cash, this may be requested to be paid to the Cash Facility in the normal manner.

Q. What about rebalancing, regular withdrawals, Cash Facility top ups and regular investments?

A. None of these will affect a Stockbroker Account. They are separate processes affecting only the Investments held with Wealthtime within the Product Wrapper and do not affect the Investments held in a Stockbroker Account.

Q. What about the charges?

A. Charges are applied to the funds and Investments held within a Stockbroker Account. Initial Adviser Charges where applicable will apply to all cash sent to Wealthtime including that destined for a Stockbroker Account. Ongoing Adviser Charges will be levied on the full value of the Product Wrapper including the Stockbroker Account holding.



Switch charges will not apply to:

- · Trading within the account
- the movement of funds to set up a new account and
- · movement from the account to the Cash Facility.

Charges will be levied from the Cash Facility of the Product Wrapper and paid to you in the normal manner as explained in the Terms of Business.

Q. What if my Client wishes to cancel?

A. A cancellation notice may be exercised for a Product Wrapper that holds a Stockbroker Account. However, you or your Client must ensure that all Investments held within the account are sold as cash before Wealthtime can release the monies back to them. The Stockbroker Account will be closed and cash returned as per the normal cancellation process. Details of this are available in our terms and conditions.

Q. Can I transfer stock in and out of a Stockbroker Account?

A. Yes, you may in-specie transfer shares and other stock into or out of a Stockbroker Account. There is no Charge for transfers in, and details of the Charges for transfers out may be found in the Charges Schedule. You will need to ensure that the institution which currently holds or will receive the stock allows transfers, and you must complete a Re-registration Application. This contains a section for transferring Investments into a Stockbroker Account. For more information, please speak to client services.

Q. What if Investments are bought that are not acceptable for the Product Wrapper?

A. It is you and your Client's responsibility to ensure that Investments purchased through a Stocktrade Account are permissible for that Product Wrapper and do not breach any associated regulations or legislation. Guidance is provided in this document and the referenced regulations but if you are still unsure, please contact Client services. You and your Clients may be required to reverse any trade that is deemed unacceptable and any costs of dealing or market losses will be your Client's responsibility.

Q. Do I have to deal for my Client?

A. No, you and your Client can decide who will have dealing rights for the Stockbroker Account. Once this is decided, simply state this on the application and dealing access will be granted to that individual. The other party will be given view-only access to the account.

O. What documentation will my Client receive?

A. Documentation regarding a Stockbroker Account and any trading conducted will be issued by Stocktrade to the person given dealing rights. When an account is opened, Stocktrade will issue a welcome letter, the Wrap Member Terms of Service, the Service Guide, as well as its Conflicts of Interest and Order Execution policies. When trades are conducted, Stocktrade will issue contract notes and periodic statements direct to the dealing party. A year end pack containing a consolidated tax voucher for the Stockbroker Account will also be sent by Stocktrade no later than 90 days after the end of the tax year.

Wealthtime is a trading name of Novia Financial plc. Novia Financial plc is a private limited company registered in England and Wales. No. 06467886. Registered office: Cambridge House, Henry St, Bath, BA11JS. Novia Financial plc is authorised and regulated by the Financial Conduct Authority. FCA Number 481600.

The Novia Offshore Bond is issued by RL360 Insurance Company Limited ('RL360') (RL360 is authorised by the Isle of Man Financial Services Authority and registered in the Isle of Man. No. 053002C Registered office International House, Cooil Road, Douglas, Isle of Man IM2 2SP) and is marketed and administered by Novia Financial plc, trading as Wealthtime.

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