



The Spectrum IFA Group

International Financial Advisers

Spectrum Client Charter – what you can expect from us Client Relationship Document (CRD)

This document details the association between Spectrum, Spectrum advisers and their clients. The term ‘Spectrum’ refers to those companies and advisers that form part of The Spectrum IFA Group.

- 1. Independently owned:** The Spectrum IFA Group is independently owned. No financial institutions or other third parties have shareholdings in any part of the group. We are legally obliged to highlight those companies with whom we place more than 10% of our business: Prudential International and Utmost PanEurope are key participants in our market. Details of other product providers are available on request.
- 2. Financial planning:** Spectrum offers a no obligation, no fee financial review and planning service. This allows prospective clients to fully understand our advice process and recommendations before choosing to become a client.

During this process we complete a comprehensive ‘know your client’ financial fact-find in order to understand your immediate circumstances as well as longer term plans, needs and objectives. We also complete a due diligence exercise in line with global anti-money-laundering regulations and assess your attitude to risk, professional financial experience and investment preferences, including in relation to Environmental, Social and Governance (ESG) factors.

- 3. Reasons why:** Prior to completion of application documents, Spectrum will explain to you the type of product being recommended and supply a brochure (and any technical guide or other relevant material) for you to review and retain for future reference. Spectrum will take time to explain the product’s key features including charges and any potential cancellation penalties.
- 4. Your money:** Spectrum doesn’t handle client money. All transactions are completed directly between you and the financial institution responsible for your investment.
- 5. Remuneration:** Spectrum doesn’t receive fees directly from clients. For insurance advice we are remunerated by insurance company commissions. For investment advice we are remunerated by fees paid from investment service providers. As stated above, there is no fee payable for our financial planning service. If an investment fund within an insurance policy pays an additional initial commission, we undertake to rebate this to you in full by way of increased allocation. In the unlikely event that a fund is subject to a potential exit penalty, we will highlight details to you in writing. Where we take on the servicing of an existing contract, originally recommended by another advisory firm, we may arrange a servicing charge (deducted from the product), in which case it would be discussed and agreed with you in advance.

Details of Spectrum’s regulatory status, financial services licences, professional insurance, complaints procedure and **general data protection information follow in this document.**

Statutory corporate and regulatory information

This document is an essential element of the relationship between us. It contains a summary of the legal information that Spectrum must communicate to you prior to entering into a professional relationship.



With Care, You Prosper

Luxembourg | Lausanne | Rome | St.Julian’s | Paris | Eymet
Valbonne | Almancil | Barcelona | Madrid | Javea | Marbella



CORPORATE INFORMATION

- **Corporate name: TSG INSURANCE SERVICES SARL (TSG)**

Registered office: 34 boulevard des Italiens, 75009 Paris, France
SIREN: 447609108 NAF / APE: 6622Z

TSG BRANCHES

Italy: Strada di Campo Sardella, 4, Loc. Montenero, 05022 Amelia, Umbria. Codice fiscale: 12418981002

Luxembourg: 11, avenue Guillaume, L-1651 Luxembourg. RCS Luxembourg: B 95136

Malta: Junction Business Centre, 1st Floor, Sqaq Lourdes, St Julian's, SWQ 3334. Reg No OC 1376

Portugal: Rua Sacadura Cabral, Lote 262, Loja C, 8135-144 Almancil. Matricula 980731828

Spain: Paseo de Gracia 63, Pral 2ª, 08008 Barcelona. CIF W0267715A

Switzerland: avenue d'Ouchy 14, 1006 Lausanne. No Ref: 2009/02231 No Fed: CH-550-1057049-3

- **Corporate name: THE SPECTRUM IFA GROUP LIMITED (TSIG)**

Junction Business Centre, 1st floor, Sqaq Lourdes, St. Julians Malta SWQ 3334
Malta Business Registration Company Code C104229

REGULATION

- TSG is registered with ORIAS (Unique register of the financial intermediaries) under registration number 07025332. You can check this registration on the ORIAS website www.orias.fr for the following regulated activities:

Intermédiaire en Assurance - Insurance Intermediary (IAS): broker category B, level of advice 1

The activity of IAS is controlled by the Autorité de Contrôle Prudentiel et de Résolution – Prudential Control and Resolution Authority (ACPR): 4 place de Budapest, 75436 PARIS Cedex 09
and internet: <https://acpr.banque-france.fr/>

Conseiller en Investissements Financiers - Financial Investments Adviser (CIF): Non-independent advice as defined in article 325-5 of the RGAMF, registered with Association Nationale des Conseils Financiers - National Association of Financial Advisers (ANACOFI-CIF) organisation approved by the Autorité des Marchés Financiers - Financial Markets Authority (AMF), postal address: 17 place de la Bourse 75082 Paris Cedex 02 and internet address: <https://www.amf-france.org/en>

TSG is fully committed to comply with the ANACOFI-CIF Code of Conduct - available at the association's headquarters on <https://www.anacofi.asso.fr> or <https://www.anacofi-cif.fr/>.

- TSG in Switzerland is regulated by FINMA. Licence Number: F01350462
- TSIG in Malta is regulated by the MFSA. Authorised Person ID TSIG22387

Professional insurance

In accordance with EU and local laws TSG has professional civil liability insurance coverage for its various financial activities. This insurance coverage complies with the requirements of the Monetary and Financial Code and the Insurance Code among other regulations.

TSG France, TSG EU Branches and TSIG

QBE Europe - Policy Number : 103191- Insurance coverage (IAS) : €3,000,000 Investment coverage (CIF): €1,000,000

TSG Switzerland

AIG Europe - Policy Number : ZF33A00326 Coverage: CHF 2,000,000

List of main product suppliers

Name	Nature	Type of agreement	Mode of remuneration
Prudential	Insurer	Broker's agreement	Commissions
La Mondiale	Insurer	Broker's agreement	Commissions
Onelife	Insurer	Broker's agreement	Commissions
Sogelife	Insurer	Broker's agreement	Commissions
Utmost PanEurope	Insurer	Broker's agreement	Commissions
Novia Global	Platform	Broker's agreement	Fees

Details of other companies with which Spectrum has agreements can be requested by email: admin@spectrum-ifa.com

Invoicing and remuneration

The investment advice provided by TSG is defined as 'non-independent' in article 325-5 of the Règlement Général de l'Autorité des Marchés Financiers - General Regulation of the Financial Markets Authority (RGAMF). Likewise, TSG's activity as an insurance intermediary is defined by Article L521-2 II. 1 °. B) of the Insurance Code.

TSG assesses a limited range of financial products issued by financial institutions with which TSG maintains strong contractual relationships.

TSG does not charge fees directly to clients. As a non-independent adviser, TSG can be remunerated by the companies supplying the intermediated products, in the form of commissions taken from part of the initial and ongoing costs of the products or deduction of fees from a platform (for investment business).

TSG does not charge fees directly to clients. We are remunerated by fees paid from investment service providers in the event you proceed with our recommendations.

In Switzerland, TSG operates as an untied intermediary under FINMA authorisation and is remunerated by insurance company commissions, details of which appear in our Fiche LSA advice document.

Complaints procedure

TSG France, TSG EU branches and TSG Switzerland: contact by mail: Michael Lodhi, TSG Insurance Services SARL, 34 boulevard des Italiens, 75009 Paris , France. Or by email to: michael.lodhi@spectrum-ifa.com

TSG will process your complaint within the following deadlines:

Maximum 10 working days to acknowledge receipt of your complaint, except if the query is answered within this timescale. Two months maximum between the date of receipt of the complaint and the date of despatch of our response, except in the case of duly justified special circumstances.

TSIG: contact by mail: Michael Lodhi, The Spectrum IFA Group Ltd, Junction Business Centre, 1st floor, Sqaq Lourdes, St. Julians SWQ 3334, Malta. Or by email to: michael.lodhi@spectrum-ifa.com

TSIG will acknowledge your complaint on receipt and respond in full within 15 working days, or if unable to do so within this timescale, confirm the reason and a date by which a full response will be provided.

MEDIATOR CONTACT DETAILS

For TSG : ANACOFI: Médiateur de l'Anacofi, 92 rue d'Amsterdam, 75009 Paris

For investment activities: Ms. Marielle Cohen-Branche Médiateur de l'AMF, Autorité des Marchés Financiers 17, place de la Bourse 75082 Paris Cedex 02

Website: <https://www.amf-france.org/en/amf-ombudsman/how-mediation-works/what-ombudsmans-remit>

For insurance activities: La Médiation de l'Assurance TSA 50110 75441 PARIS CEDEX 09

Website: <http://www.mediation-assurance.org/Saisir+le+mediateur>

For TSIG: Arbitrer for Financial Services, 1st Floor, St Calcedonius Square, Floriana FRN 1530, Malta

<https://financialarbiter.org.mt/>

MODE OF COMMUNICATION

Spectrum will communicate with you by letter, email and/or telephone.

Information notice regarding the processing and protection of personal data:

The personal data collected by Spectrum will be saved in a computerised file on a secure server, and will only be used to understand your current situation and prepare recommendations to help you achieve your financial goals. This "Know Your Client" exercise forms part of our advisory process and is also a regulatory requirement, which upholds the principles of best practice and best advice.

The person in charge of the processing and protection of personal data at Spectrum is Anne Ollerenshaw.

The recipients of this data are:

1. The administrative personnel of Spectrum
2. The company supplying the product to which you will subscribe, if applicable.

In France, this information will be kept for the duration of our professional relationship and for a minimum of five years after the end of the relationship (see L.561-12 of the CMF). In Malta (Data Protection Act Chapter 586 of the Laws of Malta) and Spain (Ley Orgánica 3/2018 de Protección de Datos Personales y garantía de los derechos digitales) the information will be kept for ten years after the end of the relationship.

In accordance with EU General Data Protection Regulations, you can exercise your right of access, opposition and portability of your personal data and have it rectified by contacting: TSG Insurance Services SARL, 34, boulevard des Italiens, 75009 Paris, or by email to: anne.ollerenshaw@spectrum-ifa.com

In Switzerland, TSG is committed to protecting your personal data and privacy and using such data in accordance with the legal requirements of the 2023 Swiss Federal Data Protection Act (nLPD), and the EU's 2018 General Data Protection Regulations (GDPR).

Date and signatures

Adviser name:

Date:

Client name:

Client name:

I/we confirm receipt of this four page Client Charter and Relationship document.

Client signature:

Client signature:

Two copies, one retained by client(s)