



Consumer Duty Supplement

31st December 2025

Purpose

This document is intended to assist clients and intermediaries in understanding the investment services provided by W1M Wealth Management (“W1M”). Clients and intermediaries should carefully read the details before deciding on the investment service and mandate appropriate for their needs, characteristics and objectives.

This document meets W1M's obligations for investment services under the Financial Conduct Authority's (“FCA”) Consumer Duty regime. It is intended for financial advisers, introducers and clients to aid understanding and decision-making.

About W1M

W1M is a wealth management and discretionary investment service provider to private clients, institutions and charities through segregated and platform-based portfolios with a total asset under management of c.£24.5bn as at 31st December 2025.

Segregated portfolios are for direct clients of W1M who will have a dedicated Portfolio Manager and associated team assigned to manage their accounts in line with the agreed investment mandate. Platform-based portfolios are for indirect clients of W1M whereby W1M will manage these clients' assets in line with the pre-defined investment mandate selected by the relevant client's chosen investment adviser.

Types of clients

W1M currently accepts the following types of clients:

- Individuals
- Trusts
- Companies
- Charities
- Funds / Pooled Investment Vehicles

Types of accounts / tax wrappers

W1M currently services the following types of account structures or tax wrappers:

- General investment account
- Individual Savings Account (“ISA”)
- Pensions – Self Invested Pension Plan (“SIPP”)
- Pensions – Small Self-Administered Scheme (“SSAS”)
- Offshore Bonds
- Onshore Bonds
- Corporation of Lloyds
- Protected Cell Companies (“PCC”)
- Funds / Pooled Investment Vehicles

Investment mandates

The following investment mandates are available at W1M:

- Equity
- Growth
- Balanced
- Cautious
- Defensive
- Conservative
- Bonds

Refer to the W1M website (<https://www.w1m.com/>) or literature from your W1M contact for further information. For directly-invested clients in particular, refer to the “Guide to our Investment Mandates” for more information on the investment mandates available.

Please note: our definitions of the investment mandates may differ from other firms’ definitions so it is important that you understand your decision by reading the descriptions within our W1M literature to understand fully the implications of your mandate choice. This document is not intended to be relied upon as investment advice.

Investment mandate table

Investment Mandate	Neutral Equity Weighting	Equities Range	Bonds Range	Alternatives Range	Investment Objective
Equity	100%	80-100%	0-20%	0-20%	CPI + 4.5%
Growth	75%	55-90%	5-36%	0-27%	CPI + 4.0%
Balanced	60%	40-75%	10-45%	5-33%	CPI + 3.5%
Cautious	45%	25-60%	15-50%	8-43%	CPI + 3.0%
Defensive	33%	13-48%	20-55%	15-50%	CPI + 2.5%
Conservative	25%	5-40%	20-60%	18-53%	CPI + 2.0%
Bonds	0%	0%	80-100%	0-20%	CPI + 1.5%

Investment services – Target market

A “target market” are those clients whose needs, characteristics and objectives are compatible with our investment mandates.

Our investment mandates are available for both Retail and Professional clients. We do not distinguish between a client’s investment knowledge or experience as W1M will act in the capacity of a discretionary investment manager, making trading decisions for and on behalf of the client. Our investment mandates and services are available to all clients that:

- are comfortable with exposure to investment risk
- have the capacity and willingness to accept a degree of capital loss, and
- are comfortable with investing for the recommended minimum time horizon (see below)

For each investment mandate, we set a recommended minimum investment time horizon, reflecting the period over which the strategy is designed to operate and over which clients are most likely to achieve their intended investment outcomes. Performance of the portfolio should be viewed with these horizons in mind.

Riskier mandates require a longer investment time horizon due to larger exposures to more volatile asset classes such as equities.

The following table provides an overview of the recommended minimum investment time horizon for each investment mandate:

Investment Mandate	Minimum Investment Time Horizon
Equity	8 years
Growth	7 years
Balanced	6 years
Cautious	5 years
Defensive	4 years
Conservative	3 years
Bonds	3 years

Investment services – Negative target market

A “negative target market” are those clients or groups for whose needs, characteristics and objectives our investment mandates are not compatible.

W1M’s investment mandates and services are not suitable for clients:

- seeking full capital protection
- having no ability to bear investment losses, or
- requiring guaranteed income or guaranteed returns

Investment services – Distribution strategy

W1M’s investment services to retail clients are split between three business lines:

- Private clients
- Charities
- Adviser Solutions

Further information is available for our investment services on our website.

The table below provides an indication as to how investors are able to access W1M’s investment mandates and above investment services.

Distribution Strategy		Private Clients	Charities	Advisor Solutions
Direct clients	Advised / Introduced	✓	✓	✓
	Unadvised	✓	✓	✓
Indirect clients (Platform-based)	Advised / Introduced	n/a	n/a	✓

Investment services – Assessment of value

As a discretionary investment manager, W1M is required by the FCA to review its investment services to provide an indication as to the value (benefits) provided to clients against the costs to be incurred.

Each of our investment services are reviewed prior to launch, prior to significant changes as well as on an ongoing basis to ensure they continue to provide value to clients.

The objective of these assessments is to confirm that clients will receive fair value for making their decision to invest within one of W1M's investment mandates and investment service lines.

In undertaking these assessments, the following aspects were taken into consideration, but not limited to:

- Investment returns generated over a range of periods, including the recommended minimum investment time horizon
- Fees paid by clients, including overall fees that include costs of investments held within a client's portfolio
- Other benefits received by clients, including access to Wealth Managers, Portfolio Managers or other investment personnel at W1M, ability to attend W1M-hosted events and access to W1M literature and views
- Quality of service provided to clients based on servicing and portfolio management errors made by W1M
- Volume and materiality of complaints raised (if any) and the timeliness of resolution
- Results from client and financial adviser surveys
- Any other reviews conducted, such as by internal audit, external audit or the regulator, the FCA, and
- Industry recognition, such as awards that link into good client outcomes

The below table depicts the conclusion from the fair value assessments undertaken.

Distribution Strategy		Private Clients	Charities	Adviser Solutions
Direct clients	Advised / Introduced			
	Unadvised			
Indirect clients (Platform-based)	Advised / Introduced	n/a	n/a	

Key

- Provides value to clients
- Provides value in most but not all areas; additional monitoring and/or further action has been proposed
- Has not provided value; appropriate further action is required

Consumer understanding

To aid understanding of our investment mandates and investment services, the following can be relied upon by our clients:

- Interaction and discussion with dedicated Portfolio Managers
- W1M literature stored on our website, <https://www.w1m.com/>
- Legal documents stored on our website, <https://www.w1m.com/regulatory-disclosures/>
- Guide to our Investment Mandates
- Quarterly booklets and factsheets
- Suitability Flyer, issued annually within quarterly booklets
- Access to W1M-organised events, podcasts and market commentary
- Access to W1M's website as a store of important documents, information and aides, and
- Access to W1M's public social media content including important updates and informative material

Consumer support

To support our clients in pursuing their investment objectives, W1M provides the following support:

- Ability to contact dedicated Wealth Manager or Portfolio Managers or their team assistants by phone, face-to-face, over e-mail or through digital videocalls
- Team assistants are available to support the Wealth and Portfolio Managers in administrative tasks and able to handle client calls and queries
- Online portal access as an easy source of storage of documents, such as quarterly valuation booklets
- Provision of documents and reports in braille format if required, and
- Ongoing support to clients displaying vulnerable characteristics through more regular interaction by Wealth Managers and Portfolio Managers

Important information

Past performance is not a reliable indicator of future results. The value of investments and the income derived from them may rise as well as fall, and investors may not get back the amount originally invested. Capital security is not guaranteed.

This material is provided for informational purposes only and does not constitute investment advice or a recommendation. It should not be considered an offer to buy or sell any financial instrument or security. Any investment should be made based on a full understanding of the relevant documentation, including a private placement memorandum or offering documents where applicable.

W1M Wealth Management Limited is authorised and regulated by the Financial Conduct Authority of 16 Babmaes Street London SW1Y 6AH, with firm reference number 120776. Registered in England and Wales, Company Number No 2042285.

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