Additional Voluntary Contribution (AVC) Plan

Operations
Process Guide



Contents

1. Introduction	3
2. Enrolment	4
3. Contributions	4
4. Changes to Employee Information	5
5. Annual Renewal and SMPI Statements	6
6. Account Corrections	7
7. Leavers	8
8. Transfers In	8
9. Transfers Out	8
11. Retirements	9
12. Bereavement	9
13. Regulatory Responsibilities	10
14. Fidelity Quality Controls	12



1. Introduction

This guide sets out the procedures to be followed in the day-to-day administration of your Additional Voluntary Contribution (AVC) plan (the Plan).

We will provide administration services in accordance with our standard procedures, as may be amended from time to time by us. This will include you supplying us with such information as we may reasonably require from time to time in an agreed format.

This guide should be reviewed in conjunction with the following documents:

- Plan Specification setting out the key information about your Plan, including the main parties involved in the administration of the Plan, the services we will provide to you and any special conditions which apply to the processes described in this document.
- **Instructions Schedule** setting out who is authorised to give Fidelity email, phone and signed instructions for the Plan and who has access to PlanViewer.
- PlanViewer Guide for Admin Users covering how to complete the key tasks that admin users will carry out regularly on PlanViewer.

Please refer to the Glossary for definitions of the pension terminology used in this document.

Further information and guidance can be found at our Workplace Investment website:

Workplace Investing - Employers
Workplace Investing - UK Employees
WI Client Help and Support



2. Enrolment

Employees can be enrolled into your Plan according to scheme rules or eligibility criteria.

For all methods, details of how to provide data to us is shown in your <u>PlanViewer User Guide</u>. On enrolment, Fidelity will set up a pension account on our administration system and generate and issue a Welcome Pack to the member.

3. Contributions

If the plan is open to ongoing contributions, the process is as below:

Stages	Employer	Member	Fidelity	Exceptions/ Information
Calculating Contribution Payments	The employer will deduct the percentage or amount of AVC as elected by the member.	There are no limits on the amount of contribution any eligible member and their employer may make, but HMRC does restrict the level of contributions that can attract tax relief. Members are responsible for monitoring if the Annual Allowance, Tapered Annual Allowance and/or Money Purchase Annual Allowance is exceeded and for notifying HMRC that an Annual Allowance Charge (a personal tax charge) is due. Please refer to this link for further information.		Although contributions can be paid after a member has reached age 75, the member's contributions do not qualify for tax relief.
Submitting Contribution Data	Contribution data should be submitted via file upload in PlanViewer (unless you have SFTP (Secure File Transfer Protocol) in place. If you are submitting more than one month's contributions, they should be in separate files and labelled for the correct payroll name and payment period.		We will contact you if there are any queries on the data you have submitted via PlanViewer or SFTP. We cannot invest contributions until any queries are resolved.	



Payment	Contributions must reach Fidelity by bank transfer no later than the 22nd of the month following that in which the contributions were deducted from pay. Please ensure that you have provided us details of any new joiners and that they are at an active status ahead of providing any contributions on their behalf.	The date of the payment for a contribution is the date on which the monies are received by Fidelity.	We will request payment of your contributions within two business days of you submitting your contribution data to us. Fidelity monitor receipt of contribution payments to ensure they are received within the regulatory timescales. We are required to report material payment failures to members and The Pensions Regulator. You can find out more about these requirements here.	A return of overpaid contributions can only be made in certain circumstances but, before this is agreed, Fidelity will consider any relevant HMRC guidance in this area.
Investing Contributions			Contributions received by 4pm UK time will be invested with a price date of the following business day. Contributions received after 4pm UK time will be invested with the price two business days after receipt.	Contributions will be returned to the employer if they cannot be invested, for example where new joiner information has not been received.

4. Changes to Employee Information

Stages	Employer	Member	Fidelity	Exceptions
Change of Details - Active Member	employee's details. This includes personal details as well as items related to their membership of the plan such	personal details via PlanViewer or contact Fidelity's Workplace Investing Service Centre Alternatively, the member will be advised of the appropriate course of action (i.e. to update via their employer or Lead	member either via post or email depending on the data item, contact information and mail preferences.	employers can update an amendment to a date of birth via PlanViewer. An employer



Change of	Employers cannot update	Can update their personal	We will issue confirmation of	Members cannot update
Details-	changes to these member	details via PlanViewer or	changes made to the	their date of birth or name
Deferred	records. Members should be	contact Fidelity's Workplace	member either via post or	via PlanViewer. These can
Member	directed to Fidelity to update	Investing Service Centre	email depending on the data	only be updated by
	their details.	Alternatively, the member	item, contact information and	contacting Fidelity
		will be advised of the	mail preferences.	Workplace Investing Service
		appropriate course of action		Centre.
		(i.e. to update via their		
		employer or Lead		The Plan Specification will
		Administrator).		show if deferred members
		·		cannot update their address
				via PlanViewer. Members
				should contact Fidelity's
				Workplace Investing Service
				Centre.

5. Annual Renewal and SMPI Statements

If the plan is open to ongoing contributions, the process is as below:

To enable us to produce the Statutory Money Purchase Illustration (SMPI) for your members, we need to update our systems with each member's pensionable salary or total earnings and contribution information. The process for doing this is detailed below and there is also an <u>Annual Renewal Guide</u>.

Stages	Employer	Fidelity	Exceptions
Initial Data Request (IDR)	The data set required for benefit statement generation should be provided in the template that will be sent to you as part of the initial data request. The data should only be provided for those members who are active on the agreed renewal date. You should confirm if any earnings limit is applicable and the current level, if different to that detailed in your Plan Specification.	Fidelity will send the Initial Data Request (IDR) at least four to six weeks prior to the renewal date.	
Data Submission	Renewal data should be submitted via PlanViewer by the deadline date shown in our request or via SFTP (Secure File Transfer Protocol) if that is in place.	We will contact you if we haven't received your data by the date provided in our request.	
Data Queries	We will require you to help us to resolve any data mismatches by the deadline date provided in our request.	We will contact you if we haven't received your response by the date shown in our request.	
Statement Generation and Issue	If there is any additional text to be included on the member statements, or an insert to be included with the statements, it should be sent before the statement generation activity. It is important that member email addresses (both work and personal) are updated on their records to ensure they receive statement notifications. Members need to set up	As soon as we determine the data is correct and have no further queries, we will produce the statements. These will appear online in PlanViewer for your members, and they will be sent an email notification to confirm this. Approximately seven days after the online statement is available, a Video Benefit Statement will also be available for active members to view.	If members set their preference to not receive electronic communications the statement will be posted to them. If an email notification to a member is returned as undelivered, the statement will be posted to them.



their preferences if they want e- delivery notification.	

6. Account Corrections

From time to time, corrections may need to be placed on member accounts where an error has occurred. In the event of errors identified by the employer, please contact the Service Delivery Team.

When an error occurs, both parties will discuss in detail the nature and extent of the error and Fidelity will outline the anticipated timeline to correct the member accounts affected. Where Fidelity or a fund provider have made an error, we will ensure that the affected member account is not financially disadvantaged; this may be subject to *de minimis* limits and any tax considerations. We will communicate with members as appropriate.

Stages	Employer	Member	Authorised Third Parties	Fidelity	Exceptions
Identification of an Error	Contact Service Delivery Team when an error is identified, providing details of the nature of the error.	Members should contact the Workplace Investing Service Centre if they believe an error has occurred on their account.	Authorised third parties should contact the Workplace Investing Service Centre if they believe an error has occurred on a member's account.		Employer may decide to take corrective action, for example, by adjusting payroll.
Impact Analysis and Outcome	Upon receipt of the results of the analysis of members' accounts you will confirm if the correction should proceed and agree to the associated costs. In the event of a late contribution payment, the Trustees require that a correction is carried out. See contributions section for further details.			We will analyse the impact on the member account and confirm to the employer the cost of the correction as well as any associated administration charge. See note below**	If a member account gains from an error, no corrective action will be taken but there may still be associated administration charges for conducting the analysis.



Corrective Action	The employer agrees to the correction and pays the amount requested (if applicable).		Account corrections will be carried out and confirmation will be provided when complete.	
Member Communications	Communications to impacted members will be agreed between the employer and Fidelity.		Communications to impacted members will be agreed between the employer and Fidelity.	No communication is sent to a member where the account has gained from the error.

^{**}Fidelity reserves the right to charge an administration fee of £100 per hour. This fee will be invoiced separately after the corrective action has been completed. Fidelity will request 110% of the loss calculated in order to cover unit price fluctuations whilst the corrective action is being taken. Any monies in excess of the amount needed to make the correction will be returned to you.

7. Leavers

If a member leaves the employer's service or is no longer eligible to be a member of the Plan, they will become a deferred member and their benefits will remain in the Plan until retirement, death or transfer out. See your <u>PlanViewer User Guide</u> for further details on how to notify us of these members.

8. Transfers In

If a member makes a request, the Plan may accept transfer payments of uncrystallised benefits from:

- other UK registered pension schemes, or
- certain types of overseas plan.

Transfers in of Crystallised Funds are not permitted.

All member requests to transfer into the Plan should be directed to the Lead Administrator.

Fidelity will action authorised instructions.

9. Transfers Out

All member requests to transfer out of the Plan should be directed to the Lead Administrator.

Fidelity will action authorised instructions.



10. Divorce

If a member is going through divorce proceedings, they should contact the Lead Administrator of the Plan. If the Court decides to opt for pension sharing on the divorce or dissolution of civil partnership, they will issue a pension sharing order (PSO), which will show the pension share as a percentage of the pension account. This amount is then available for the former spouse or partner to transfer to their chosen pension scheme or provider.

Fidelity will action authorised instructions.

11. Retirements

Members cannot normally access their pension until they have reached the Normal Minimum Pension Age (currently age 55, increasing to age 57, from 6 April 2028).

Fidelity will send notifications to the Lead Administrator notifying of forthcoming retirements at six months ahead of the normal or selected retirement age as held on the member's record.

Fidelity will action authorised instructions.

11.1 III Health and Serious III Health Retirement

Where certain conditions are met a member may be able to access their pension benefits before the Normal Minimum Pension Age (NMPA).

Members who wish to make an application for III Health Retirement should contact the Lead Administrator for information on the options, requirements, and process.

12. Bereavement

	Employer/Lead Administrator	Potential Beneficiaries	Fidelity	Exceptions
Initial Actions	Bereavement Team informing Fidelity that the	Service Centre to inform Fidelity that the member has passed away.	status and switch the pension account to the cash	
and Payment	The Trustee will send an authorised instruction to disinvest the AVC.		Will make the payment to the Trustee bank account and send notification accordingly.	



Death Benefits	FIL will transmit death	
Reporting	benefits details for DC pot to	
	HMRC for chosen	
	beneficiaries on date of	
	payment.	

13. Regulatory Responsibilities

Stages	Employer	Fidelity
PAYE (Taxable Withdrawals)	Provide the information that Fidelity requires in a timely manner. The Pensions Regulator outlines the timescales for employers to provide information to their Scheme Administrators in Managing a scheme - Record-keeping: employer duties: Record-keeping: employer duties The Pensions Regulator	Fidelity has PAYE Schemes with HMRC solely for the purposes of accounting for and paying the Income Tax due on taxable payments and will process all such cases arising under your Plan and correspond directly with HMRC with regards to the tax deducted. There is no requirement to issue a P11D to members who received a taxable payment or small pot commutation payment, however there is a requirement for them to be sent a P45 or P60 in these circumstances. Fidelity will submit real-time information to HMRC online regarding the payments and tax deducted and send the P45 to the member with the applicable payment. We will send them their P60 shortly after the end of the tax year in which we made the payment to them. We only use tax codes provided to us by HMRC.
Late Contribution Payments	Electronic contributions must reach Fidelity before the 22nd of the month following that in which the contributions were deducted from pay. This is a legal requirement.	Members receive tax relief at their marginal rate, through their employer's payroll. Failure to pay contributions by the legal deadlines can require Fidelity to inform the members of the past due payment of contributions (and hence of the associated tax relief) and to report the breach of law to The Pensions Regulator. Please see TPR's Code 5 Reporting late payment of contributions to occupational pension schemes The Pensions Regulator
Regulatory Returns	Registration Reporting: Within specified timescales, the Employer must provide The Pensions Regulator (TPR) with certain information, including:	Information that Fidelity will provide to the employer to assist it with its regulatory reporting to TPR:
	Details of the employer's business Details of the plan or plans they are using to comply with the employer duties Please see: Pension scheme reporting regulatory duties The Pensions Regulator Fidelity will not undertake the registration reporting with TPR as we will not necessarily have details of all plans or have access to all required employer data. We will, however, make some of the member data required for the report available via PlanViewer - please see the 'Fidelity' column, right.	FIL will provide the information to the Scheme Administrator to submit the following directly to HMRC: • Accounting for Tax and Event Reporting FIL will provide the information to the Scheme Administrator to transmit death benefits details for DC pot to HMRC for chosen beneficiaries on date of payment.



HMRC and	HMRC outlines the respective responsibilities of
Taxation	Scheme Administrators, members and employers in its
	Pensions Taxation Manual. Please see: Pensions Tax
	Manual - HMRC internal manual - GOV.UK
	(www.gov.uk)ll

Stages	Member	Fidelity
Annual Allowance Reporting	Disclose in their self-assessment returns to HMRC the value by which pension savings across all their pension schemes in aggregate, exceeded the Annual Allowance (or the Money Purchase Annual Allowance if applicable). It is the member's responsibility to ensure they have used any applicable carry forwards relief when making their disclosure, or for calculating their Tapered Annual Allowance (if applicable). The member is responsible for paying their Annual Allowance Charge. However, members are permitted to authorise any of their pension schemes to pay it. Scheme Administrators are not obliged to facilitate voluntary Scheme Pays, but Fidelity does do so. Mandatory Scheme Pays. The member must have exceeded their Annual Allowance (AA) by at least £2,000. Please note this is the Annual Allowance and not just the Money Purchase Annual Allowance (MPAA) or Tapered Annual Allowance (TAA). The member must notify us by 31 July of the year after the tax year in which they incurred the Annual Allowance Charge (AAC), For example, if the member incurred the AAC in the Pension Input Year (the tax year) 6 April 2022 to 3 April 2023, they must notify us by 31 July 2024 if they wish us to pay it to HMRC from the Scheme. The notification deadline can be brought forwards where the member has taken all of their benefits or attained age 75. Notice deadline extended The 'Scheme Pays' notice deadline is extended for a pension scheme when the following applies: The member is given a pension savings statement for a tax year: on or after 2 May in the year following that in which the tax year in question ends, and before the end of the period of 6 years beginning with the end of the tax year in question to the pension scheme for the tax year due to either: the Scheme Administrator is required to give the member that pension savings statement because of a change to the member's pension input amount, in relation to the pension scheme for the tax year in question. The Scheme Administrator receiving additional information from a t	It is the Scheme Administrator's responsibility to disclose to members who have exceeded the standard Annual Allowance (or Money Purchase Annual Allowance if applicable) in respect of total contributions under their arrangements, following the end of the Pension Input Period (which is the tax year). The disclosure deadline is 6 October following the end of the tax year. Fidelity will provide data to the Lead Administrator to produce Pension Savings Statements, and these will be produced using the date contributions are received by Fidelity. Fidelity is not permitted to refund contributions to a member simply because the member has exceeded their Annual Allowance/Tapered Annual Allowance or Money Purchase Annual Allowance (whichever is applicable) including any allowance carried forward. Fidelity facilitates both Mandatory and Voluntary Scheme Pays. This enables the member to authorise us to pay their Annual Allowance Charge from the pension plan administered by Fidelity. For more information, please see HMRC's Pensions Taxation Manual: PTM051100 - Annual allowance: essential principles - HMRC internal manual - GOV.UK (www.gov.uk)
	question. Voluntary Scheme Pays basis. If the Mandatory Scheme Pays criteria are not met, Fidelity will still facilitate Scheme Pays if scheme rules allow. For example, if the member has exceeded their AA or has a tax charge of less than £2,000. Please note that the deadline for the member to inform us for Voluntary Scheme Pays is 31 August after the tax year in which they incurred	



the AAC. That is, if they incurred it in the 2022-2023 tax year (ending 5 April 2023), they must inform us by 31 August 2023.

14. Fidelity Quality Controls

A copy of our AAF quality control report is available on request from the Service Delivery Team.



NOTES

- 1. Information assets that are proprietary to FIL, private to FIL's customers and other private or proprietary information assets and resources that, if subject to inadvertent or unauthorised disclosure, would likely cause financial, legal, regulatory, or reputational damage to FIL. Information assets take many forms including, but not limited to: electronic, printed, written, transmitted, stored and spoken.
- 2. Confidentiality: ensuring that information is accessible only to authorised individuals
- 3. Integrity: safeguarding the accuracy and completeness of information and processing methods
- 4. Availability: ensuring that authorised users have access to relevant information when required
- 5. Refer to local, national or regional regulation and legislation as appropriate
- 6. This shall ensure that information and vital services are available to users whenever they need them

Important information

Issued by FIL Life Insurance Limited. Fidelity, Fidelity International, the Fidelity International logo and the F symbol are trademarks of FIL Limited.