

Purpose

This document is designed to help clients (existing and potential) and financial advisers determine whether we can help clients achieve their financial objectives and, if we can, which of our services is most likely to do so. Clearly defining our Target Market is a reasonable step we can take to avoid causing foreseeable harm to clients and ensuring we act in good faith.

Downing Growth Estate Planning Service ("the Service")

Name of the product manufacturer: Downing LLP (FRN 545025)

Website: www.downing.co.uk

Telephone number: +44 (0) 207 4630 3319

Competent Authority of the product manufacturer in relation to the Target Market Document: UK Financial Conduct Authority

Date of production of this Target Market Document: August 2025

What is this product?

Type: Discretionary managed portfolio (inheritance tax solution).

Objectives: Downing at its discretion, place investors directly into a portfolio of unquoted companies that they believe will qualify for Business Relief (BR). If BR qualifying shares are held for at least two years and at the date of death, the shares should benefit from inheritance tax relief. The minimum investment is £25,000 for retail investors and £100,000 for professional investors.

Target market investors

- UK investors who have a UK inheritance tax liability
- Investors who are advised retail or professional clients
- Investors who have a sufficient risk tolerance to put their full amount of capital invested at risk
- For the optional life cover, intended investors should be seeking to insure themselves against losses of up to 40% of their gross subscription in the event of death within the first 2 years, subject to a monetary cap

Negative target market investors

- Investors who may need access to capital to meet their regular financial commitments
- Investors who do not want to take any investment risk or do not have a capacity for any loss
- Investors who do not have an inheritance tax liability
- Investors not willing to delegate investment decisions or clients wishing to make their own decisions to trade

Recommended holding period

To qualify for inheritance tax relief, shares must be held for a minimum of 2 years and on death.

Knowledge and Experience

Investors should have knowledge of how this type of Service works and/or experience investing in one or more of the below:

- Unquoted company investment and understanding the risks involved
- Potentially illiquid investments where access to capital is not guaranteed
- Tax reliefs, understanding that reliefs available for inheritance tax may vary as result of changing tax rules and personal circumstances

To ensure that retail investors have the prerequisite knowledge and experience, the product will be open to advised clients only (as well as professional clients). Advisers will ensure that retail investors possess sufficient knowledge and experience, to satisfy advisers suitability.

Risk Tolerance

The Service has been categorised as high-risk because the components of the portfolio are unquoted companies, which are typically higher-risk and less liquid than their listed counterparties. Investors should have sufficient risk tolerance to put their full amount of capital invested at risk.

Distribution strategy

- Retail investors will be advised by an FCA regulated adviser
- Professional investors may access the Service directly

As identified within this document, our Target Market is relatively broad and as a result, will contain a demographic of clients that will currently have, or will have in the future, a wide range of characteristics of vulnerability.

Our staff receive regular training on vulnerabilities and are available to help any client understand our services or their portfolio. In addition, we have processes in place to look after our clients' interests if they become vulnerable. Notifying us allows us to tailor our support for these clients to meet their needs.