



ZEDRA

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Chair's annual report

St. James's Place Workplace Personal Pension Plans

- | Year ended 31 December 2024
- | The ZEDRA Governance Advisory Arrangement (GAA)

September
2025



Executive summary

This report on the workplace personal pension plans provided by St. James's Place ("SJP", the "Firm"), has been prepared by the Chair of the ZEDRA Governance Advisory Arrangement ("the GAA") for pension policyholders. It sets out our independent assessment of the value delivered to policyholders and our view of the adequacy and quality of the Firm's policies in relation to Environmental, Social and Governance (ESG) risks, non-financial considerations and stewardship.

Further background on the activity of the GAA and details of the credentials of the GAA can be found in Appendices C and D respectively. The GAA works under an agreed Terms of Reference, the latest version of which is dated 30 March 2022 and is publicly available (see Appendix D).

As Chair of the GAA for this Firm, I am pleased to deliver this value assessment of St. James's Place workplace personal pension plans. The GAA has conducted a rigorous assessment of the Value for Money ("VfM") delivered to policyholders over the period 1 January 2024 to 31 December 2024. The GAA has developed a Framework to assess Value for Money which balances the quality of services and investment performance provided to policyholders against what they pay for those services and investment performance. Further details are set out on page 6.

The SJP plans fall into two distinct categories as follows:

- | Group Personal Pension Schemes ("GPPs") & Individual Pension Plans ("IPPs") – provided with advice from a St. James's Place Partner
- | St. James's Place Staff Pension Scheme ("the Staff Scheme") provided with no advice. This is the only workplace scheme which is qualifying for auto-enrolment purposes.

A COLOUR CODED SUMMARY OF THE GAA ASSESSMENT

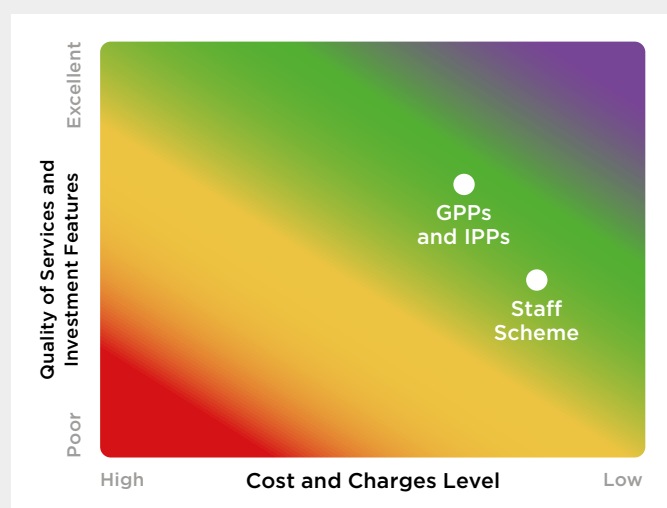
	Weighting toward VfM assessment *	SJP GPPs and IPPs	SJP Staff Scheme
1. Product strategy design and investment objectives	13%	●	●
2. Investment performance and risk	10%	●	●
3. Communication	17%	●	●
4. Firm governance	7%	●	●
5. Security of policyholder benefits	7%	●	●
6. Administration and operations	10%	●	●
7. Engagement, Innovation and Improvements for policyholder experience	3%	●	●
8. Cost and charge levels	33%	●	●
Overall Value for Money assessment	100%	●	●

* May not add to 100% due to rounding

Quality and investment features (1-7) ● Excellent ● Good ● Satisfactory ● Poor	Cost and charge levels (8) ● Low ● Moderately Low ● Moderately High ● High
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How we determine our Value for Money rating is set out on page 7 of this report. The overall Value for Money is visually represented by the heatmap below.

VALUE FOR MONEY SCORING



Our conclusion is that the GPPs and IPPs provide **good** value for money and the Staff Scheme provides **satisfactory** value for money.

The GAA has challenged the firm in the following areas:

- | SJP has the advantage that it has bespoke funds, and the funds objectives are clear but descriptive rather than clearly quantifiable. We note that the description of risks is very detailed but have challenged over a number of years whether a policyholder could easily determine their long-term expected return or indeed whether the funds had met their long-term objectives. The GAA would like to see this addressed by next year.
- | SJP have recognised the need to improve both how SJP articulate the fund's investment objectives and approach and how SJP evidence outcomes to clients through relevant benchmark performance information. SJP have committed to a review their prospectus in the second half of 2025 and will also consider expanding benchmark disclosures within the Factsheets, including clearer descriptions of how these benchmarks should be judged alongside relevant performance data.
- | The GAA would like to see greater functionality/ options for Staff members who no longer work for SJP, for example, they currently cannot make switches online. The GAA noted that SJP have recognised this issue in 2023 and have now mobilised a project to mitigate the problem. The GAA have requested a timescale and understand the process is taking place in 2025-2026.
- | The GAA noted that there is a need for improvement in transfer-out transactions being processed within the service level agreement with SS&C, whilst appreciating an increase in work volume, and also that there had been a continued drop in complaints resolutions in December 2023 due to a focus on clearing old cases during this month. The GAA also noted service levels had also improved generally. In line with the rulings and guidance from the FCA and the Financial Ombudsman Service which was discussed on page 8 of this report, the Firm have significantly scaled up their capacity to handle an expected high level of complaints and resultant transfers during 2024 and 2025.

The GAA also raised the following concerns:

- | The Staff Pension Oversight Committee completed a review of the default fund in 2024. The outcome of this review was that ideally the Managed Growth Fund should be replaced as the default fund with a Lifestyle strategy, however this cannot be achieved with the current administration set-up and therefore this will be incorporated in the wider Staff Pension Strategy Review. The full Staff Pension Strategy review was due to take place in 2024-2025 but has been shifted to 2026.

The GAA also observed that:

- | SJP Factsheets have been omitting benchmarks for pension policy holders to compare fund performance. The GAA identified this issue and brought it to the attention of SJP and SJP have now taken steps to rectify this in the latter part of 2025.
- | Longer term fund performance has generally been good and cost savings as a result of SJP scale are passed on to members. However, some active strategies have again found it harder to keep outperform benchmarks in 2024. There is good short- and long-term reporting available for policyholders.
- | Whilst the GAA noted that investment funds underperformed relative to benchmarks in 2024, this should be viewed in the context of the economic environment for 2024 and the performance of peers in the market as well as longer term performance.

We were pleased to note that the previously raised challenge regarding number of complaints and poor service levels has improved as a result of the increased resource applied by SJP.

We also concluded that the Firm's policies in relation to **Environmental, Social and Governance** (ESG) risks, non-financial considerations and stewardship were adequate and well implemented.

The FCA requires a comparison of your pension product with other similar options available in the market. If an alternative scheme appears to offer better value, we must inform the pension provider.

I can confirm that we have not considered it necessary to make this notification this year. Our view on each feature that we are required to make a comparison on is included in the relevant section of the report. Details of how we selected the comparator group is set out in Appendix B.

A joint consultation was launched in early 2023 by the Financial Conduct Authority (FCA), the Department for Work and Pensions (DWP) and The Pensions Regulator (TPR) on the framework for assessing Value for Money. This consultation set out a transformative framework of metrics and standards to assess value for money across all Defined Contribution (DC) pension arrangements including the workplace pensions reviewed by the GAA. The regulator's overarching aim is to improve the value savers get from their DC pension by increasing comparability, transparency, and competition across defined contribution (DC) pension schemes, regardless of whether regulated by the FCA or TPR. The consultation does not affect this year's review but may mean a change in the way that Value for Money is assessed in the future.

Where we have used technical pensions terms or jargon, these are explained in the glossary in Appendix E.

Details of the numbers of policyholders and their funds were supplied to ZEDRA for the assessment and are summarised in Appendix F.

I hope you find this value assessment interesting, informative and constructive.

Dean Wetton

Chair of the ZEDRA Governance Advisory Arrangement
for St. James's Place

September 2025



If you are a policyholder or pathway investor and have any questions, require any further information, or wish to make any representation to the GAA you should contact:

Client Services, St. James's Place Wealth Management,
1 Tetbury Road, Cirencester, Gloucester, GL7 1FP.

Alternatively, you can contact the GAA directly at zgl.gaacontact@zedra.com



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Overview of the value assessment

The GAA has assessed the Value for Money delivered by the Firm's GPPs, IPPs and the Staff Scheme to its workplace personal pension policyholders by looking at costs versus investment and service benefits. More detail about how we have done this is set out below.

Our approach

The GAA believes that value for money is subjective and will mean different things to different people over time, depending on what they consider important at that time.

What is clear is that it is always a balance of cost versus investment and service benefits. Our fundamental approach has therefore been to compare all the costs paid by policyholders against the investment performance and quality of services provided to policyholders.

The key steps for the GAA in carrying out the Value for Money assessment are:

- | Issuing a comprehensive data request to the Firm, requesting information and evidence across a wide range of quality features, including [net investment performance](#), as well as full information on all costs and charges, including [transaction costs](#).
- | Attending a number of formal meetings with representatives of the Firm to interrogate the data provided and to enable the GAA to question or challenge on any areas of concern. All such meetings have been documented by formal minutes and a log is also maintained

containing details of any challenges raised, whether informally or through formal escalation.

- | Once the Firm has provided the information and evidence requested, the GAA has met to discuss and agree provisional Value for Money scoring using the Framework developed by the GAA and to undertake comparisons of the Firm's product against a suitable comparator group of providers for certain Quality of Service and Investment Features and Cost and Charges.
- | The provisional Value for Money score, including a full breakdown, has then been shared and discussed with the Firm.

The Framework developed by the GAA to assess overall Value for Money for policyholders involves rating the Firm against eight different features covering Quality of Service, Investment Performance and Strategy (the "Quality of Service and Investment Features"), and the Costs and Charges borne by the Policyholders. This assessment is undertaken relative to the GAAs view of good practice.

The Quality of Service and Investment Features have been determined based directly on the FCA requirements for assessing ongoing Value for Money set out in [COBS 19.5.5](#), including services relating to communications with policyholders and processing of [core financial transactions](#). The assessment also includes other aspects the GAA considers important based on our experience of conducting Value for Money assessments over many years, such as the Firm's governance structure, the financial security for policyholders, the Firm's approach to engagement, innovation and service improvement, and a wider overview of the administration quality and processes.

Within each of the Quality of Service and Investment Features are several sub-features. These sub-features are each scored using a numeric scoring system. Scoring is aided by means of score descriptors, developed for each sub-feature, ensuring the GAA adopts a consistent approach to scoring across clients, each outlining what the GAA would expect to see to achieve the relevant numeric score. The scores for each sub-feature are then aggregated to the feature level based on our view of the relative value of the sub-feature to the policyholders ranging from Poor to Excellent.

The GAA will then consider the value represented by the costs and charges which policyholders bear. The assessment of cost and charge is primarily driven by the level of ongoing charges for investment management, administration, and any platform fees. The GAA also considers the underlying transaction costs incurred by the funds invested in and how they are controlled, and any additional costs the policyholders have to pay in managing their policies. The costs and charges are also rated on a scale from Low to High. This rating takes into account information available to the GAA on general levels of costs and charges for pension providers in the marketplace.

The scores for each feature are then combined using the weightings set out in the table in the Executive Summary to determine an Overall Value for Money rating. The weightings used are based on the GAA's views of the relative importance to the policyholders of each feature. The weightings are tilted towards the features which have been identified in the regulations relevant to forming this assessment of value. Where possible, we have taken into account the likely needs and expectations of this group of policyholders.

In the sections on the following pages, we have described the Firm's approach to delivering each of the features, and the rating the GAA has awarded, together with any areas for improvement we have identified.

In addition, there is a section setting out the GAA's views on the adequacy and quality of the Firm's policies on ESG financial considerations, non-financial considerations, and stewardship. Whilst this is a largely qualitative assessment the GAA has considered the Firm's policies in comparison to others the GAA has knowledge of.

A comparative assessment of the Firm's pension product has also been made of the net investment performance, quality of communication and quality of the administration service including processing of core financial transactions, and costs and charges relative to a suitable comparator group of product providers. Comments on the outcome of these assessments is included in the sections for the relevant Features. We have also considered whether, overall, an alternative provider would offer better Value for Money so that we can inform the Firm if we believe this to be the case. Details of how the comparator providers and products were determined is set out in Appendix B.

Significant events of 2024

Review of ongoing advice

As per 2023 the GAA considered SJPs review of ongoing advice, an issue which has cut across a number of evaluation areas for GPPs and IPPs (this does not directly impact the Staff Scheme), so it is best to summarise the issue here.

In its full year results, published February 2024, SJP set aside a provision of £426mn for potential client refunds to address ongoing advice issues, after it saw an uptick in complaints.

SJP chief executive officer, Mark FitzPatrick, said: “This work was undertaken following a significant increase in complaints, particularly in the latter part of 2023, mostly linked to the delivery of ongoing servicing.”

Most SJP clients are entitled to ongoing advice in the form of an annual review of their benefits and investments with SJP. As part of its decision to set aside the provision, SJP undertook a review of the ongoing advice provided to each client entitled to it. SJP has reported that while most clients received the ongoing advice they expected, there were a proportion of cases where the adviser had either not had the annual review or could not evidence that they had done so. In these cases, redress was paid to affected clients in the form of a refund of the associated charge.

SJP said advisers began writing to clients from August 2023 reminding them to have their annual review. SJP implemented new checking procedures in 2024, whereby an adviser is required to provide evidence of ongoing advice on an annual basis.

Additionally, SJP had made significant changes to its complaints process to more effectively manage the high volume of claims experienced. The GAA also noted that during the second half of 2024 advised complaint numbers significantly decreased.

The GAA noted that this is a very significant exercise that would take SJP two to three years to complete.

Following the original announcement of the £426mn provision, the FCA told clients to avoid using claims management companies and to engage with SJP directly. In a statement in 2023 an FCA spokesman said: “St James’s Place has said it will contact those affected. As a result, there is no need for people to use claims management companies.” On its website ([How to make a complaint | St. James’s Place \(sjp.co.uk\)](https://www.sjp.co.uk/how-to-make-a-complaint)), SJP advises customers to approach them directly if they have any issues they would like to raise. In line with rulings and guidance from the FCA and Financial Ombudsman Service, regardless of whether customers have experienced a financial loss or not on their investments as a result of ‘unsuitable advice’, SJP have considered, where relevant, whether an ongoing advice service was provided and if not, the charge will be refunded with interest.

SJP have confirmed that they have progressed the review of historic client servicing records and following the FCA’s new industry guidance around ongoing financial advice services, issued in February 2025, they have revised their redress methodology to better align it with both the new industry guidance and their experience. SJP have confirmed that this revised redress methodology has led to a £84.5 million release in the Ongoing Service Evidence provision. Whilst the GAA noted that the following updates were made by SJP outside of the 2024 period, they are relevant.

The GAA has noted that the full effects of the above have now passed and that the majority of the impact on the various areas covered in this report including Governance, Charges, Administration and Operations and Engagement, Innovation and Improvements for Policyholder Experience has been limited to the report for 2023 and 2024 although the GAA will continue to monitor this.



1. Product strategy design and investment objectives

GPPs & IPPs value score:

☐ Excellent ☒ Good ☐ Satisfactory ☐ Poor

Staff Scheme value score:

☐ Excellent ☐ Good ☒ Satisfactory ☐ Poor

What are we looking for?

We want to see that all investment options have clear statements of aims and objectives – in particular that as well as qualitative objectives, there are quantitative objectives in place, that investment performance outcomes can objectively be measured against. Ideally, we would like to see evidence that these objectives link back to the needs of policyholders.

We are also looking for evidence of a robust ongoing review process for all investment options, including the default, and evidence that the Firm has taken steps to implement changes to investment options, where appropriate, to ensure alignment with policyholders' interests.

Whilst policies on [ESG](#) financial considerations and non-financial matters are considered separately on page 28, we expect to see evidence of how these matters are taken into account in the design of the investment strategy and in investment decision making.

The Firm's approach

The Firm does not offer default strategies to their GPP and IPP policyholders. Each policyholder's investment choices are specifically tailored to the policyholder through advice from their St. James's Place (SJP) Partner. The investment choices used are made up of the full range of bespoke St James's Place funds.

These funds are all well governed, and the management is outsourced and monitored. In addition, the fund range includes a series of model portfolios designed for specific classifications of policyholder. The SJP Partner advises and selects from the blend of the investment funds available. The Firm have defined the process by which SJP Partners give policyholders advice. This includes a framework for SJP Partners to offer this advice and how the Firm monitors and guarantees this advice. For all cases where advice is given, it is backed by a guarantee provided by St James's Place Wealth Management Group which guarantees the suitability of the advice given by the SJP Partners (advisors). Advisers are required to contact and arrange annual reviews with each of their clients. SJP has confirmed in 2024, advisers have also provided this evidence to SJP.

The Staff Scheme, on the other hand, has a default investment choice which is designed by the Firm for its employees. The default fund is the Managed Growth Fund and is not lifestyle-based. It is reviewed for appropriateness to scheme members by the Staff Pension Oversight Committee on an annual basis. Policyholders of the Staff Scheme also have the option to self-select across the whole universe of St. James's Place funds.

The Firm's strengths

The GAA has reviewed the portfolio construction methodology used by the Investment Committee and notes that the Firm carries out its own value assessment of its unit trust range into which many of the pension funds invest.

The range of funds is determined by the Firm and how it is tailored for individuals in GPPs and IPPs is determined by the SJP Partner, under supervision by the Firm. This offers individuals a higher level of governance compared to most other workplace pension schemes. Therefore, we

believe this is likely to lead to more appropriate individual investment strategies for policyholders.

There is a strong process for designing and governing the funds that the Firm offers with a wide range of available funds across a variety of asset classes. In addition, the GAA has seen evidence that the model portfolios are reviewed and monitored regularly.

All funds have a risk rating displayed clearly on their factsheets. All investment options have relevant aims/objectives which are communicated on the fund factsheets. As the funds are bespoke to the Firm, changes can be made easily and effectively for members. The Investment Committee is experienced and very well resourced and takes external advice from several advisors.

The GAA saw clear evidence of how the Firm's policies on ESG financial considerations and non-financial matters are incorporated in the investment strategy and in investment decision making.

Areas for improvement

GAA challenge

SJP has the advantage that it has bespoke funds, and the funds objectives are clear but descriptive rather than clearly quantifiable. We note that the description of risks is very detailed but have challenged over a number of years whether a policyholder could easily determine their long term expected return or indeed whether the funds had met their long-term objectives. The GAA would like to see this addressed by next year.

SJP have recognised the need to improve both how SJP articulate the fund's investment objectives and approach and how SJP evidence outcomes to clients through relevant benchmark performance information. SJP have committed to a review their prospectus in the second half of 2025 and will also consider expanding benchmark disclosures within the Factsheets, including clearer descriptions of how these benchmarks should be judged alongside relevant performance data.

GAA concern

The Staff Pension Oversight Committee completed a review of the default fund in 2024. The outcome of this review was that ideally the Managed Growth Fund should be replaced as the default fund with a Lifestyle strategy, however this cannot be achieved with the current administration set-up and therefore this will be incorporated in the wider Staff Pension Strategy Review. The full review was due to take place in 2024/5 but has been shifted to 2026 and the GAA would like to see this completed during 2026.



2. Investment performance and risk

GPPs & IPPs value score:



Excellent



Good



Satisfactory



Poor

Staff Scheme value score:



Excellent



Good



Satisfactory



Poor

What are we looking for?

We would expect to see a robust governance framework under which investment performance is monitored on a regular basis. Performance should be measured against investment objectives, including against a measurable and stated benchmark. Performance should be net of fees. In addition to the stated benchmark comparison risk adjusted returns should also be considered.

Where there are any concerns over investment performance, we expect to see evidence of appropriate action being taken, which may include engagement with investment managers and/or implementing changes to fund options. We also expect to see evidence that the strategies are effective and take into account the policyholders' attitudes to risk.

The Firm's approach

The Firm has a comprehensive governance framework in place for regularly monitoring fund and portfolio performance and risk. The Investment Committee has ultimate responsibility for all the governed funds and portfolios, delegating the necessary actions to responsible individuals within

the Investment Division. Investment manager performance is reviewed on a fortnightly basis for all asset classes on a rotating basis so that each asset class is considered every two months. Investment performance is measured against appropriate index and peer benchmarks and seven RAG criteria are used to rate each manager, encompassing performance, risk, trading behaviour, [ESG](#), corporate risk and service levels. Meetings with individual investment managers take place approximately every six months so that the Investment Committee can understand the reason behind any deviation in performance, what action is being taken and decide what additional action may be necessary. Action is taken to remove managers, where necessary.

The governance function of the Investment Committee is supported by strong inhouse expertise and the use of external consultants. This is underpinned by technology, with risk analytics from industry leading portfolio risk systems, including BlackRock's Aladdin and Bloomberg, at the manager, fund and portfolio level. The Firm also considers the UN Principles for Responsible Investment (PRI) ratings for each manager when making changes and have ensured that all managers receive at least an "A+" rating.

The Firm's strengths

The Firm has demonstrated there is a robust governance framework in place and has provided clear evidence of the monitoring undertaken during the year. The investment division provides quarterly reporting and reviews with the investment oversight bodies including the Investment Committee, Investment Division, Product Governance Committee, Investment Operations Committee, Executive Committee and the St. James's Place Unit Trust Group Ltd Board.

Net investment performance

The [net investment performance](#) of the most significant funds by client investment available to policy holders over 12 months to 31 December 2024 and, where available, the performance of the benchmarks against which those funds are measured by the Asset Manager are set out in the following table. The Firm measures performance against several benchmarks including style factors and peer groups; we have only shown the primary benchmarks below for the top 20 funds by assets, in that order (representing approximately 89% of assets) where the performance period available for assessment is at least one year.

Pension Fund	Net Investment Performance 1 year *	1 year Benchmark	Net Investment Performance 5 year *	5 year Benchmark
Polaris 3***	12.0%	16.4%	Not available	Not available
Polaris 4***	14.3%	19.6%	Not available	Not available
Global Equity	20.4%	19.6%	8.0%	11.3%
Polaris 2	9.8%	13.2%		
Global Value	11.0%	19.6%	10.9%	11.3%
Global Quality	10.6%	19.6%	5.8%	11.3%
International Equity	22.2%	19.6%	7.1%	11.3%
Global Growth	21.3%	19.6%	8.2%	11.3%
Managed Growth**	14.2%	14.7%	4.8%	8.1%
Balanced Managed	7.9%	14.7%	4.6%	8.1%
Global Managed	12.7%	19.6%	9.1%	11.3%
Strategic Managed	12.0%	14.7%	4.3%	8.1%
Sustainable & Responsible Equity	8.7%	19.6%	8.3%	11.3%
North American	9.8%	26.8%	9.6%	15.3%
Global Absolute Return	7.6%	5.2%	0.2%	2.3%
Emerging Markets Equity	5.8%	9.4%	7.9%	2.8%
Investment Grade Corporate Bond	2.7%	3.1%	-2.4%	-0.1%
Growth In Retirement	10.7%	16.2%	Not available	Not available
Diversified Assets	5.1%	10.5%	4.2%	6.3%
Strategic Income	10.7%	10.1%	1.5%	4.1%

* The investment performance figures above are net of annual management charges, fund charges and transaction costs, but have been adjusted to exclude the impact of advice charges.

** Note the Managed Growth Fund is the default for the SJP Staff Scheme.

*** Polaris funds were launched on 21 November 2022, and 5-year returns are therefore not available.

Comparator results

We have assessed how the net investment performance provided to the Firm's policyholders compares to other sufficiently similar employer pension arrangements. This takes account of both the nature of the provider and the performance of the investments being offered relative to an appropriate benchmark.

For SJP GPPs and IPPs this assessment identified that the one-year net investment performance relative to benchmark for the Firm's policyholders over 2024, weighted by the size of funds invested, was significantly below average, i.e. relative to benchmark.

For the SJP Staff Scheme this assessment identified that the one-year net investment performance relative to benchmark for the Firm's policyholders over 2024, weighted by the size of funds invested, was below average, i.e. relative to benchmark.

Areas for improvement

GAA observations

Longer term fund performance has generally been good and cost savings as a result of SJP scale are passed on to members. However, some active strategies have again found it harder to outperform benchmarks in 2024. There is good short- and long-term reporting available for policyholders.

Whilst the GAA noted that investment funds underperformed relative to benchmarks in 2024, this should be viewed in the context of the economic environment for 2024 and the performance of peers in the market as well as longer term performance.



3. Communication

GPPs & IPPs value score:



Excellent



Good



Satisfactory



Poor

Staff Scheme value score:



Excellent



Good



Satisfactory



Poor

What are we looking for?

As a minimum we expect communications to be fit for purpose, clear and engaging and to be tailored to take into account policyholders' characteristics, needs and objectives.

We would expect to see a comprehensive suite of communications including annual benefit statements, pre-retirement wake-up letters and retirement option packs.

Information on administration charges and [transaction costs](#) should be made available to policyholders on a publicly available website annually, including illustrations of the compounding effect of the administration charges and transaction costs on an annual basis.

In a high-quality communication service offering we would expect a substantial online offering, with a range of online support materials such as online calculators to enable personalised calculations with various selectable options. We would expect telephone support to be available, with good evidence of telephone scripts, call monitoring and staff training.

Additionally, we would expect policyholders to be able to switch investment options online and to have support available to help them make appropriate decisions. In particular, we would expect there to be appropriate risk warnings built into the process.

We would expect the provider to be able to offer a range of different retirement options for policyholders, as well as clear signposting to policyholders on where they can obtain guidance and advice on their retirement options.

The Firm's approach

Communications provided to policyholders in the GPPs and IPPs, centre around the personal advice provided through the SJP Partners.

In addition, policyholders have access to the Online Wealth Account and the SJP app. This provides information such as daily fund valuations and interactive performance monitoring. Policyholders also have access to the helplines at the Firm's administration centre.

Members of the Staff Scheme are not automatically provided with advice but are able to appoint an SJP Partner through the 'Financial Guidance for Employees' service. Standard Advice charges would then apply. Members of the Staff Scheme also have access to their Online Wealth Account and the SJP app and can contact the Firm's Reward Team with queries. In addition, Staff Scheme members have access to online educational webinars and other ad hoc communications from the Firm.

The Firm's strengths

The GAA has been provided with a range of sample communications to review. Communications are clear, engaging and free of jargon, whilst also not being over simplified albeit the GAA has concerns over policyholders being able to understand the fund factsheets. The Online Wealth Account communications and SJP app are designed to be supportive of the face-to-face communications provided by the SJP Partner, but also work as stand-alone documents.

The Firm provides policyholders with access to a wide range of options at retirement, including advice on the options, although this comes at an additional cost for Staff Scheme members.

Comparator results

We have assessed how the communication materials provided to the Firm's policyholders compare to other sufficiently similar employer pension arrangements. This takes account of the nature of the provider.

For SJP GPPs and IPPs this assessment identified that the communication materials provided to the Firm's policyholders over 2024 were average, i.e. relative to the comparator group.

For the SJP Staff Scheme this assessment identified that the communication materials provided to the Firm's policyholders over 2024 were below average, i.e. relative to the comparator group.

Areas for improvement

GAA observation

SJP Factsheets have been omitting benchmarks for pension policy holders to compare fund performance. The GAA identified this issue and brought it to the attention of SJP and SJP have now taken steps to rectify this in the latter part of 2025.

GAA challenges

The GAA would like to see greater functionality/options for Staff members who no longer work for SJP, for example, they currently cannot make switches online. The GAA noted that SJP have recognised this issue in 2023 and have mobilised a project to mitigate the problem. The GAA requested a timescale and understand the process is taking place in 2025-2026.



4. Firm governance

GPPs & IPPs value score:



Excellent



Good



Satisfactory



Poor

Staff Scheme value score:



Excellent



Good



Satisfactory



Poor

What are we looking for?

We would expect to see a comprehensive governance structure in place where, for example, Terms of Reference are provided for key committees, reviewed on a regular basis, with clearly defined scope. We would expect to see evidence of the key committees operating during the year with minutes or meeting packs demonstrating that the key scope elements of the committee remit have been adequately covered.

There should be a transparent and documented process for appointing and monitoring service providers, with evidence of regular reviews being undertaken and changes being made as required.

The Firm's approach

The Firm's Investment Committee adopts a rigorous due diligence process when appointing investment managers and has evidenced how it has actively taken steps to make changes, where necessary.

The Advice Committee sets the Firm's policies for ensuring suitable financial advice is provided to clients. This includes setting the Advice Framework which outlines standards and best practice for SJP Partners when advising their clients and documenting their advice.

The Business Assurance function monitors compliance with the Firm's policies, and checks are carried out on sample cases, prioritising areas of higher risk, such as where a DB transfer may be involved.

The Firm outsource most of the administration to SS&C. They monitor SS&C's performance via regular reporting and there are monthly governance meetings where performance against agreed service levels and service quality are kept under review.

The Firm's strengths

St James's Place have a particularly robust structure for their investment governance whereby the funds and assets are controlled by the Firm but managed by selected investment managers. These managers are carefully reviewed internally and with additional external expert support. The Firm were able to evidence the process undertaken for the removal of a manager during the year and the appointment of a new manager to the Greater European Progressive fund.

The Firm apply a rigorous due diligence process when appointing investment managers and make changes where necessary. This also applies to the oversight of advice by SJP Partners and outsourcing providers such as administration.

Areas for improvement

The GAA did not identify any specific areas for improvement.



5. Security of policyholder benefits

GPPs & IPPs value score:



Excellent



Good



Satisfactory



Poor

Staff Scheme value score:



Excellent



Good



Satisfactory



Poor

What are we looking for?

We expect to see that the Firm is in a sound financial position with sufficient capital backing to enable it to continue to operate for the foreseeable future.

We also look for information about how the assets are protected, for example in the event of fraud or bankruptcy, at both the Firm and investment manager level. For example, this could relate to FSCS or other regulatory protections, ringfencing or the structure of the underlying product.

We are looking for evidence that the Firm has processes in place for protecting policyholder assets against fraud and scams and for Firms to be actively monitoring for possible scamming activity.

Policyholder benefits are secured by matching the assets invested to the contractually agreed benefits, with no risk carried other than the investment risk policyholders have chosen to be exposed to.

Risk management, including security of IT systems, is the responsibility of the Chief Operations and Technology Officer. The security in place for the Firm includes a full cyber security team made up of in house and external resource. All data is encrypted, and routine penetration testing is done. This includes ethical hacking, penetration testing, patch testing and monitoring the dark web for data leakage.

The SJP Group Solvency ratio was 154%. The Fitch Rating - Long-Term Issuer Default Rating "A".

The Firm's approach

St James's Place plc is a UK wealth management company. The organisation has significant resources backing the business.

There is independent assurance of internal controls for the management processes. Similarly, where available, Audit Assurance Framework reports are obtained and reviewed for each asset manager for the underlying funds.

The Firm's strengths

The Firm maintains a good solvency ratio, assets match clients' unit liabilities and in addition FSCS protections are available for policyholders in the event of a failure within St James's Place.

The Firm has a comprehensive Security Risk Management Framework in place overseeing IT security, cyber security and data protection, including regular penetrating testing.

Cyber security is good, and likelihood of fraud is low as most clients are personally known to the SJP Partner advisers.

Areas for improvement

The GAA did not identify any specific areas for improvement.



6. Administration and operations

GPPs & IPPs value score:

☐ Excellent ☐ Good ☒ Satisfactory ☐ Poor

Staff Scheme value score:

☐ Excellent ☐ Good ☒ Satisfactory ☐ Poor

What are we looking for?

We expect Firms to have robust administration processes in place with appropriate service standard agreements and regular monitoring and reporting around adherence to those service standards. In particular, we are seeking evidence that **core financial transactions** are processed promptly and accurately, such as processing contributions, transfers processing and death benefit payments.

We look for evidence of regular internal and external assurance audits on controls and administration processes. In particular, we are looking for a robust risk control framework around the security of IT systems, data protection and cyber-security. We would expect to see evidence that cyber-security is considered as a key risk by the Firm's relevant risk governance committee and that appropriate monitoring, staff training and penetration testing is put in place.

We expect Firms to have a comprehensive business continuity plan and evidence of its effectiveness through appropriate testing or in maintaining continuity of business.

We would expect to see a low level of substantive complaints and demonstration of a clear process for resolving complaints.

The Firm's approach

The majority of the administration functions are outsourced to a company called SS&C. The Firm monitor SS&C's performance via regular reporting and there are also monthly governance meetings where KPIs, service quality, complaints and errors are discussed.

The Firm's service provider did not meet all its administration Service Standards throughout the year however, service improved from August 2024.

There is a comprehensive business continuity plan in place and business continuity was maintained throughout the year.

The Firm experienced a relatively low level of complaints from pension policyholders during the year and their process for resolving those complaints was followed, with appropriate redress being provided for any complaints that were upheld.

The Firm's strengths

The Firm operates a defence-in-depth approach to cyber security and adopt UK government guidelines. The defence-in-depth approach includes encryption, and isolation. 3rd party assessments and accreditation and regular testing to validate the controls, process and technology. They were one of the first FTSE 100 organisations to obtain Cyber Essentials Plus (UK Government Cyber Accreditation) in 2017 and have since maintained accreditation every year.

Comparator results

We have assessed how the quality and timeliness of the administration services, including the core financial transaction processing, provided to the Firm's policyholders compare to other sufficiently similar employer pension arrangements.

For SJP GPPs and IPPs this assessment identified that the administration services provided to the Firm's policyholders over 2024 were average, i.e. relative to the comparator group.

For the SJP Staff Scheme this assessment identified that the administration services provided to the Firm's policyholders over 2024 were average, i.e. relative to the comparator group.

Areas for improvement

GAA challenge

The GAA noted that there is a need for improvement in transfer out transactions being processed within the service level agreement with SS&C, whilst appreciating an increase in work volume, and also that there had been a continued drop in complaints resolutions during the first half of 2024, which was a continued trend from the end of 2023. In line with the rulings and guidance from the FCA and the Financial Ombudsman Service, which was discussed on page 8 of this report, the Firm significantly scaled up their capacity to handle the high level of complaints and resultant transfers during 2024 and SLAs improved significantly from September 2024.



7. Engagement, innovation and improvements for policyholder experience

GPPs & IPPs value score:

☐ Excellent ☒ Good ☐ Satisfactory ☐ Poor

Staff Scheme value score:

☐ Excellent ☒ Good ☐ Satisfactory ☐ Poor

What are we looking for?

We expect to see evidence that the product is reviewed on a regular cycle of not more than every three years, with new product features or service innovations being launched when appropriate and in line with relevant improvements being made to other similar products being offered by the Firm. We expect these changes to have been developed considering policyholders' characteristics, needs and objectives, including direct feedback from policyholders.

We are looking for evidence of regular, proactive engagement with policyholders to obtain feedback and for this feedback to be considered when reviewing the product offering.

The Firm's approach

The Firm has a Product Governance Framework in place under which a product review process is carried out annually. A review of the legacy GPPs and IPPs (including Series 1, 2 and 3 products) was completed in July 2024.

The Firm invite all clients to take part in an annual survey, which informs future product development.

The Firm's strengths

The Firm is particularly innovative in investment markets where it makes changes as required to refresh the range of offerings for policyholders and has made good progress toward implementing and including [ESG](#) considerations in its investments.

The Firm is particularly strong at engaging with policyholders to obtain feedback through its annual surveys. The survey results have been very positive, with many respondents recommending the Firm.

Between September and November in 2024, the Firm selected SJP Partner practices across the UK, to conduct research with clients via an online survey. The client satisfaction surveys reported high levels of satisfaction.

During 2022 the Firm launched the Polaris range of risk graded fund of funds to provide better governed solutions for clients because they combine several funds across asset classes into a single fund in different risk levels.

Improvements since last year

Product reviews continue to be carried out every year, which is the minimum frequency required by the Firm's Product Governance Framework and regulation.

The Firm continued carrying out review of historic evidence and delivery of ongoing servicing to clients, where appropriate will provide refunds to clients in those instances where there is a lack of evidence that ongoing servicing was delivered in the past. This continued in 2024.

Areas for improvement

The GAA did not identify any specific areas for improvement.



8. Cost and charge levels

GPPs & IPPs value score:



Low



Moderately Low



Moderately High



High

Staff Scheme value score:



Low



Moderately Low



Moderately High



High

What are we looking for?

The GAA has considered the overall level of charges borne by policyholders over the year. This included assessing:

- the annual fund management and administration charges being borne by policyholders;
- the transactions costs incurred by the underlying investment funds which reduce the investment return experienced by policyholders;
- any other charges being paid by policyholders to manage and administer their workplace pensions; and
- the Firm's process for collecting and monitoring overall member charges, including [transaction costs](#).

We expect fund management charges to be comparable to charges for similar investment products in the wider pensions market after considering the active or passive nature of the investment and the type of assets involved. We consider where the majority of [relevant policyholder](#) assets are invested.

In looking at transaction costs we also consider the overall level of volatility in the markets, recognising that in highly volatile markets transaction costs may increase.

We assess whether the overall level of administration charges is reasonable, bearing in mind the types of services provided to policyholders.

Finally for products which are used for providing auto enrolment pensions we consider the government required charge cap.

Whilst we have considered the average total costs and charges payable by policyholders we have also noted where there may be significant outliers such as high charges for small pots.

Further information on the required disclosures relating to costs and charges payable by the Firms policyholders can be found in Appendix A.

The Firm's approach

The Firm has a range of charging structures in place for each generation of its products. Within this there are some generalities that apply as described below.

For the GPP and IPP policyholders the charges include advice on investments and other matters, including providing face to face advice from the SJP Partner.

For the Staff Scheme advice is not included, and as a result the charges are lower.

Investment funds are provided on a cost basis, where any savings derived from economies of scale fee discounts negotiated by the Firm are passed on to members.

The range of expected charges has been notified to the GAA, together with an explanation of the principles of the pricing model.

As the charges for GPPs and IPPs include advisor fees, which is not the case for other workplace pensions, the GAA have applied a methodology which ascribes a notional advisor charge as an addition to the GAA's workplace pension charging scales for the purposes of assessing the costs and charges for the Firm's GPPs and IPPs. To help the GAA determine an appropriate allowance for advice the Firm have provided research and data on the typical market rate for the cost of advice, which has been estimated at 1.1% annum. The GAA have attempted in the past to ensure that policyholders only paid for advice received but the Firm were not able to provide definitive evidence that policyholders did or did not receive advice in a particular period. When advice was not given or received it was difficult for the GAA to determine whose decision this was. The Firm has now confirmed that, at part of the rectification process as at Dec 2023 a refund was provided. From 1 Jan 2024 SJP advisers have to submit evidence that policyholders received advice in a particular period. The GAA look forward to revisiting this area in the 2025 report.

Charges summary for GPP/IPP and Staff

For Policy Holders in the GPP and IPP sections, after taking into account the hypothetical advice fee of circa 1.1% members pay around 0.15% to 0.4% admin fees and the weighted average investment fee is 0.43% taking the overall cost for [active management](#) to be in the range of 0.58% to 0.83%.

For SJP Staff Scheme Policyholders the admin fee is 0.25% and the investment fee is 0.29% taking the overall cost for active management to 0.54%.

www.sjp.co.uk/individuals/charges

For fuller details refer to Appendix A.

Risk of high charges for legacy products

The GPPs and some IPPs are held in legacy products, with legacy charging arrangements. The structure for those charges was put in place when it was customary to include adviser commissions within costs.

Changes have been made in recent years to reduce the impact of legacy charging arrangements, for example the charges applying to any capital units have been significantly reduced along with the removal of fixed fees for policyholder plans with smaller values.

The GAA noted that the charges are high but include full advice for investment and other services. Transaction costs, which were calculated on the DC workplace methodology, have moderated since 2022 when it was higher due to the market volatility during that period.

The Firm's strengths

The Firm is able to negotiate good fees for active management and passes the benefits of its economies of scale onto members.

Improvements since last year

None, although charges are being considered as part of the ongoing servicing review to ensure clients are receiving the services paid for, with some policyholders receiving refunds.

On 17 October 2023 SJP announced an unbundling of its charging structure. This unbundling will mean that clients will be able to easily compare charges for advice, investment management, and other services with those available from other advice-led providers. It has been confirmed to the GAA that this has been completed and is now in place.

Comparator results

We have assessed the overall cost and charge levels payable by the Firm's policyholders in comparison to policyholders of other sufficiently similar employer pension arrangements. This takes account of the nature of the provider.

For SJP GPPs and IPPs this assessment identified that the overall cost and charge level paid by the Firm's policyholders over 2024 were above average, i.e. relative to the comparator group.

For the SJP Staff Scheme this assessment identified that the overall cost and charge level paid by the Firm's policyholders over 2024 were below average, i.e. relative to the comparator group.

Areas for improvement

The GAA did not identify any specific areas for improvement.



ESG financial considerations, non-financial matters and stewardship

What are we looking for?

Where the Firm has an investment strategy or makes investment decisions which could have a material impact on policyholders' investment returns, the GAA will assess the adequacy and quality of the Firm's policy in relation to [ESG](#) financial considerations, non-financial matters and stewardship. The GAA will consider how these are taken into account in the Firm's investment strategy and investment decision making. We will also form a view on the adequacy and quality of the Firm's policy in relation to stewardship.

We expect the Firm's policy in relation to these considerations:

- (a) sufficiently characterises the relevant risks or opportunities;
- (b) seeks to appropriately mitigate those risks and take advantage of those opportunities;
- (c) is appropriate in the context of the expected duration of the investment; and
- (d) is appropriate in the context of the main characteristics of the actual or expected [relevant policyholders](#).

We also expect that the Firm's processes have been designed to properly take into account the risks and opportunities presented.

Where ESG considerations have been delegated to external investment managers we expect the Firm to have a suitable oversight and stewardship process in place.

Whilst this formal requirement falls outside the overall Value for Money assessment, the GAA's Value for Money framework does consider, where relevant, when scoring the area of Product Strategy Design and Investment Objectives on page 9, how the Firm has integrated ESG financial considerations and non-financial matters in the Firm's investment strategy and investment decision making.

The Firm's approach

The Firm has in place policies on how it approaches ESG financial considerations, non-financial considerations and stewardship to the GAA.

In particular, the policies clearly explain how ESG is integrated within their investment decision making process.

The Firm became a UN PRI signatory in 2018 and has retained a strong UNPRI rating compared to benchmark.

The Firm has an exclusions policy in place, eliminating controversial weapons and unaddressed human rights breaches from its investments.

Improvements since last year

None, although ESG information has now been added to fund factsheets.

The GAA considers the policies to be adequate and of good quality. This is an area which is evolving, and the GAA will continue to monitor developments in this area.



Appendix A: Administration charge and transaction cost disclosures

The FCA requires that administration charges and transactions costs, in relation to each [Relevant Scheme](#) must be published by 30 September, in respect of the previous calendar year and be available for free on a publicly accessible website. These disclosures must include the costs and charges for each default arrangement and each alternative fund option that a member is able to select. They should also include an illustration of the compounding effect of the administration charges and [transaction costs](#), on a prescribed basis and for a representative range of fund options that a policyholder is able to select.

The Firm has compiled these disclosures and compounding illustrations, which are provided on a publicly accessible website www.sjp.co.uk/gaa

The Firm has provided the GAA with the following disclosures in respect of the period 1 January 2024 to 31 December 2024 in respect of the default fund(s):

	Annual Management Charge (excluding investment costs)	Implicit Admin Fee after Advice at 1.1%
GPPs	Series 1/2 0.75% p.a. for single contributions 1.50% p.a. until age 55 and 0.25% p.a. thereafter for ex-capital units of regular contributions ¹ 0.25% p.a. for accumulation units of regular contributions	0.4% pa
	Series 3 0.75% pa ²	—
IPPs	Series 1/2 0.75% pa for single contributions 1.50% pa until age 55 and 0.25% pa thereafter for ex-capital units of regular contributions ¹ 0.25% pa for accumulation units of regular contributions	0.4% pa
	Series 3 0.75% pa ²	—
	Series 4 1.25% p.a. ³ (1.10% p.a. after 10+ years ⁶)	0.15% pa
	Retirement Account 1.50% p.a. ³ (1.35% p.a. after 10+ years ⁶)	0.4% pa
Staff Pension Scheme⁵		0.25% pa

Notes:

1. An Early Exit Charge applies on withdrawals until age 55 of up to 6%.
2. Reduces to 0.25% pa if more than £20,000 is invested and has been held for more than 10 years.
3. An Early Withdrawal Charge applies on withdrawals made in the first six years of an investment of up to 6%.
4. Given the investment cost for the default investment fund (Managed Growth) of the Staff Scheme is 0.29% pa, as shown in the table below, the total of Annual Management Charge and the investment cost for Staff Scheme members who invest in the default fund is 0.54% pa.
5. No advice provided or charged for.
6. In 2023, SJP introduced a cap which improves the value for money for the Series 4 Retirement Plans and Retirement Accounts with duration of 10+ years.

Charges for managing and maintaining the Fund

The following fund charges apply in addition to the [Annual Management Charge](#).

SJP Funds	Proportion of Pensions FUM as at 31/12/24	Fund Management Charge (%) as at 31/12/24	Transaction Costs
Asia Pacific	0.85%	0.63%	0.14%
Balance InRetirement	3.82%	0.42%	0.22%
Balanced Managed	0.27%	0.40%	0.62%
Continental European	0.57%	0.17%	0.13%
Corporate Bond	1.35%	0.41%	0.00%
Diversified Assets (FAIF)	1.01%	1.46%	0.17%
Diversified Bond	1.67%	0.47%	0.31%
Emerging Markets Equity	0.58%	0.49%	0.23%
Global Absolute Return	2.35%	0.54%	2.18%
Global Emerging Markets	0.23%	0.24%	0.17%
Global Equity	7.66%	0.19%	0.08%
Global Government Bond	4.13%	0.13%	0.01%
Global Growth	1.25%	0.50%	0.34%
Global High Yield Bond	3.10%	0.42%	0.21%
Global Government Inflation Linked Bond	4.86%	0.08%	0.17%
Global Managed	0.24%	0.43%	0.36%
Global Quality	5.74%	0.52%	0.71%
Global Smaller Companies	0.43%	0.10%	0.04%
Global Value	0.19%	0.41%	0.26%
Greater European	4.14%	0.50%	0.25%
Growth InRetirement	1.53%	0.44%	0.08%
International Equity	0.18%	0.09%	0.39%
Investment Grade Corporate Bond	3.94%	0.24%	0.14%
Japan	0.71%	0.65%	0.22%
Managed Growth *	2.53%	0.29%	0.35%
Money Market	0.54%	0.11%	-0.02%
North American	6.28%	0.31%	0.07%
Polaris 1	17.81%	0.30%	0.16%
Polaris 2	10.23%	0.31%	0.18%
Polaris 3	1.30%	0.34%	0.20%
Polaris 4	2.86%	0.35%	0.21%

* Note the SJP Staff Scheme default fund is the Managed Growth Fund

Prudence InRetirement	2.75%	0.37%	0.16%
Strategic Income	0.94%	0.47%	0.13%
Strategic Managed	1.04%	0.29%	0.33%
Sustainable & Responsible Equity	0.50%	0.34%	0.17%
UK	0.15%	0.39%	0.26%
UK Equity Income	0.87%	0.35%	0.24%
Worldwide Income	1.42%	0.47%	0.11%

The charges shown above are as at 31 December 2024. These are annual figures as a percentage of the fund value in respect of the period 1 January 2024 to 31 December 2024.



Appendix B: Approach to comparisons

The FCA requires that a comparative assessment be made of certain sub-features of the Value for Money assessment. The GAA is required to compare the Firm's offering against a selected group of other similar product options available in the market based on publicly available information. If an alternative scheme(s) would offer better value, we must inform the pension provider.

ZEDRA's GAA operates for a number of Firms, all of whom have agreed that the GAA can make use of the data we have gathered on their offerings to carry out the required comparisons this year. This is done on an anonymised basis.

How the comparators were selected

The GAA has selected a number of comparator products that we determined are sufficiently similar products so as to be comparable to those provided by the Firm for this purpose. The selection was based on the following broad criteria:

- | Type of product i.e. whether accumulation or pathways, and within accumulation whether the product is a SIPP or workplace group personal pension.
- | Products where Firms provide similar services, for example whether the provider has responsibility for setting and monitoring the investment strategy.

Based on these criteria we believe that the comparator products chosen will provide a reasonable comparison for the policyholders of the GPPs and IPPS and the Staff Scheme.

Comparison of net investment performance

We have assessed how the net of fees investment performance provided to the Firm's policyholders compares to other similar employer pension arrangements. This takes account the performance of the investments being offered. Where multiple investment funds are made available, we have taken into account the amount invested by [relevant policyholders](#) in each fund.

Comparison of communication provided to policyholders

We have assessed how the full range of communication materials, including any websites and modelling tools, provided to the relevant policyholders compares to other sufficiently similar policyholder arrangements. This takes account of the type of pension product provided, and whether the communication materials are fit for purpose considering the age profile of the relevant policyholders.

Comparison of administration services

We have assessed how the quality and timeliness of the administration services, including the core financial transaction processing, provided to the Firms policyholders compares to other sufficiently similar employer pension arrangements.

Comparison of costs and charges

We have undertaken the comparison of cost and charge levels considering three categories of charges:

- | Annual administration and investment Fund charges
- | Transaction costs
- | Other costs and charges

We have assessed the overall cost and charge levels payable by the Firm's policyholders in comparison to policyholders of other sufficiently similar employer pension arrangements. This takes account of the type of product provided. The costs of services that are provided directly to the policyholder and paid for separately by the policyholder (for example financial or investment advice) are not included.



Appendix C: GAA activity and regulatory matters

This section describes the work that the GAA has done over the year and also covers the other matters which we are required to include in our annual report.

GAA engagement and actions this year

We prepared and issued a request for data on all the relevant workplace pension policies in early 2024.

Members of the GAA met with representatives of the Firm to kick off the Value for Money assessment process for the 2024 calendar year and to discuss and agree timescales.

We subsequently had a meeting with representatives of the Firm to discuss the information that had been provided in response to the data request. This was an opportunity for members of the GAA to meet key personnel with responsibility in the various different areas including investment strategy and how this has evolved, fund range including design of defaults, investment governance, approach to [ESG](#), non-financial matters and stewardship, administration and communications and risk management. In some cases this meeting was virtual.

We discussed the GAA's provisional scoring of Value for Money of the Firm's in-scope workplace pensions and the approach for meeting the cost and charges disclosure requirements in [COBS](#) 19.5.13.

As part of the Value for Money assessment process, the Firm has provided the GAA with all the information that we requested, including evidence in the form of minutes and other documentation to support areas of discussion at the site visit.

Over the last year the GAA reviewed our Value for Money assessment framework and scoring methodology to ensure this continued to be suitable and can be applied consistently. Whilst the Value for Money assessment framework itself remains largely unchanged from the previous year, work was undertaken to improve the data request to make the overall process more efficient.

The GAA documents all formal meetings with the Firm and maintains a log which captures any concerns raised by the GAA with the Firm, whether informally or as formal escalations.

The key dates are:

Item	Date
Issue data request	21/01/2025
Kick off meeting	03/02/2025
Site visit	19/03/2025
GAA panel review meeting	12/05/2025
Discuss provisional scoring	20/04/2025

The arrangements put in place for policyholders' representation

The following arrangements have been put in place to ensure that the views of policyholders can be directly represented to the GAA:

- | The role of the GAA and the opportunity for policyholders to make representations direct to the GAA has been and will continue to be communicated to policyholders via www.sjp.co.uk/governance-advisory-arrangement
- | The Firm will receive and filter all policyholder communications, to ensure that this channel is not being used for individual complaints and queries rather than more general representations which may be applicable to more than one policyholder or group of policyholders. Where the Firm determines that a communication from a policyholder is a representation to the GAA, it will be passed on in full and without editing or comment for the GAA to consider.

In addition, the GAA has established a dedicated inbox at zgl.gaacontact@zedra.com so that policyholders can make representation to the GAA directly. The Firm has included details of this contact e-mail address on www.sjp.co.uk/governance-advisory-arrangement



Appendix D: ZEDRA GAA credentials

In February 2015 the Financial Conduct Authority (FCA) set out new rules for providers operating workplace personal pension plans (called [relevant schemes](#)) to take effect from 6 April 2015. From that date, providers had to have set up an Independent Governance Committee or appointed a Governance Advisory Arrangement whose principal functions is to

- | Act solely in the interests of the [relevant policyholders](#) of those pension plans, and to
- | Assess the “value for money” delivered by the pension plans to those relevant policyholders.

These requirements were then extended to Firms providing investment pathways from 1 February 2021.

The FCA rules require that the Chair of each Independent Governance Committee and Governance Advisory Arrangement produce an annual report setting out a number of prescribed matters.

The ZEDRA Governance Advisory Arrangement (“the GAA”) was established on 6 April 2015 and has been appointed by a number of workplace personal pension providers and investment pathways providers. ZEDRA is a specialist provider of independent governance services primarily to UK pension arrangements. Amongst other appointments we act as an independent trustee on several hundred trust-based pension schemes and we sit on a number of IGCs. More information on the ZEDRA GAA can be found at www.zedra.com/GAA/

The members of the ZEDRA GAA are appointed by the Board of ZEDRA Governance Ltd. The Board is satisfied that individually and collectively the members of the GAA have sufficient expertise,

experience, and independence to act in the interests of relevant policyholders and [pathway investors](#).

The Board of ZEDRA Governance Ltd has appointed ZEDRA Governance Ltd to the GAA. The majority of ZEDRA Governance Ltd's Client Directors act as representatives of ZEDRA Governance Ltd on the GAA.

The Board of ZEDRA Governance Ltd has also appointed Dean Wetton, acting on behalf of Dean Wetton Advisory UK Ltd, to the GAA. Dean Wetton and Dean Wetton Advisory UK Ltd are independent of ZEDRA.

The Board of ZEDRA Governance Ltd has appointed either a specific named Client Director of ZEDRA Governance Ltd or Dean Wetton of Dean Wetton Advisory Ltd to act in the capacity of Chair of the GAA in respect of each Firm.

More information on each of ZEDRA's Client Directors, their experience and qualifications can be found at www.zedra.com/people.

Information on Dean's experience and qualifications can be found at <https://deanwettonadvisory.com>.

The GAA has put in place a conflicts of interest register and maintains a conflicts of interest policy with the objective of ensuring that any potential conflicts of interest are managed effectively so they do not affect the ability of ZEDRA Governance Ltd or Dean Wetton Advisory Ltd to represent the interests of relevant policyholders or [pathway investors](#).

The terms of reference for the GAA agreed with the Firm can be found at: <https://www.sjp.co.uk/sites/sjp-corp/files/SJP/governance-advisory-arrangement/gaa-terms-of-reference.pdf>



Appendix E: Glossary

Please note that some of the terms referred to in this glossary may not be applicable to your product.

Active management

The investment of funds where the skill of the fund manager is used to select particular assets at particular times, with the aim of achieving higher than average growth for the assets in question.

Annual management charge (AMC)

A deduction made by the pension provider or investment manager from invested assets, normally as a percentage of the assets. The AMC is generally how the pension provider or investment manager is paid for their services.

Annuity

A series of payments, which may be subject to increases, made at stated intervals, usually for life. If the annuity is "joint life", it will continue to a spouse (usually at a lower rate) after the death of the original person receiving the payments ("the annuitant").

COBS

The Conduct of Business Sourcebook prepared by the Financial Conduct Authority (FCA). In particular when we use COBS in this report we are referring to Chapter 19 of the COBS which sets out the provisions relevant to the Value for Money Assessment of workplace pensions.

Core financial transactions

The essential processes of putting money into a pension policy or taking it out, namely:

- | Investment of contributions
- | Implementation of re-direction of future contributions to a different fund
- | Investment switches for existing funds, including **life-styling** processes
- | Settlement of benefits – whether arising from transfer out, death or retirement.

Decumulation

The process of converting pension savings to retirement income.

Environmental, social and governance (ESG)

These are the three main factors looked at when assessing the sustainability (including the impact of climate change) and ethical impact of a company or business. ESG factors are expected to influence the future financial performance of the company and therefore have an impact on the expected risk and return of the pension fund investment in that company.

Flexible access

This refers to accessing pension savings in the form of income and/or lump sums. Pension savings that are not being accessed immediately will generally remain invested.

Life-styling

An automated process of switching investment strategy as a policyholder approaches retirement, in a way that is designed to reduce the risk of a policyholder's retirement income falling.

Net investment performance

The investment performance of the fund after deducting all asset management charges, administration charges, taxes and fees for managing the fund including any transaction costs.

Pathway investor

A retail client investing in a Firm's pathway investment offering.

Pathway investment

A drawdown fund which is either a capped drawdown pension fund or a flexi-access drawdown pension fund.

Relevant policyholder

A member of a Relevant Scheme who is or has been a worker entitled to have contributions paid by or on behalf of his employer in respect of that Relevant Scheme.

Relevant Scheme

A personal pension scheme or stakeholder pension scheme for which direct payment arrangements are, or have been, in place, and under which contributions have been paid for two or more employees of the same employer.

Transaction costs

A combination of explicit and implicit costs included within the price at which a transaction (i.e. buying or selling an asset) takes place.

With Profits

An insurance contract that participates in the profits of an insurance company. The insurance company aims to distribute part of its profits to with-profits policy holders in the form of bonuses.

Unit-Linked

A type of investment where the investments of a number of people are pooled together and divided into units of equal value. The value, or price, of each unit depends on the value of the assets of the unit linked fund. The unit price determines the number of units the policyholder receives when they invest money in the fund, and the sum they receive when they sell their units.



Appendix F: Data table

The table below shows the number of employers, policyholders and aggregate assets in respect of the workplace personal pension schemes provided by St. James's Place. These fall into a number of different categories:

St. James's Place have marketed four different generations or 'Series' of Retirement Plans, each with their own charging structure. Up until 2001 the St. James's Place Group Personal Retirement Plans, which were aligned to the first three series of pricing structures, were specifically marketed as workplace pensions. These are referred to in our report as GPPs.

In 2001 St. James's Place formally exited the workplace pension market; therefore, there is no Group version of the Series 4 Retirement Plan. However, St. James's Place do have a number of pension arrangements comprising groups of Individual Pension Plans (IPPs) in respect of which contributions are paid directly by their employer. Arrangements of this type may not be considered to be 'workplace pensions' by the individual policyholders but nevertheless they do meet the strict criteria of a '[relevant scheme](#)' as defined by FCA, (see the Glossary for the definition), and as such fall under the remit of the GAA.

Series 1 and 2 are traditional Capital/Accumulation Unit Plans, as was the nature of retirement plans in the market at that point in time.

Series 3 are Accumulation only Unit Plans.

Series 4 and Retirement Accounts have an [Annual Management Charge](#), alongside Early Withdrawal Charges.

Of all the St. James's Place Group schemes, only the St. James's Place Staff Scheme is a Qualifying Workplace scheme for Auto-Enrolment.

Employers/Scheme (if applicable)	Number of employers	Number of policyholders	Used for auto-enrolment	Size of assets and amount of capital units (if applicable)	Advised or Non-advised
GPP Series 1/2	71	491	No	15.9m	Advised
GPP Series 3	64	880	No	53.9m	Advised
IPP Series 1/2	266	283	No	26.6m	Advised
IPP Series 3	178	189	No	24.2m	Advised
IPP Series 4	5,437	12,131	No	1461.6m	Advised
IPP Retirement Account	12,741	37,619	No	2573.6m	Advised
Staff Pension Scheme	1	2,838	Yes	202.3m	Non-advised
Total	18,758	54,431		4358.1m	

Some employers have employees with a mix of product types (Series 1/2, Series 3, Series 4 and/or RA). When grouping for the above summary, hybrid ones are counted only once and are grouped under their earliest product series.

Due to the grouping method used, for some product types above (e.g. IPPs Series 1/2, Series 3), the number of policyholders per employer can be spread across multiple product types.

For example, if an employer has one employee with RA and another employee with Series 3, this employer would be grouped under the earliest Series (i.e. Series 3), whereas the two employees are grouped under RA and Series 3 respectively.



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