

Product name: Bridging Loan Broking

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Our approach to meeting the Products & Services Outcome and Price & Value Outcome

This summary document is being provided to you to fulfil our responsibilities under PRIN 2A.4.15R and PRIN 2A.3.12 R (2). -

It is designed to support you to comply with your responsibilities under PRIN 2A.3.16 R and PRIN 2A.4.16 R. Please note that you are ultimately responsible for meeting your obligations under 'The Consumer Duty'.

This information is intended for business-to-business use only and should not be provided to customers.

1. Summary of our assessment

We have assessed that:

- Our bridging loan broking product continues to meet the needs, characteristics, and objectives of customers in the identified target market.
- The intended distribution strategy remains appropriate for the target market.
- The product provides fair value to customers in the target market (i.e., the total benefits are proportionate to total costs).

2. Product characteristics & benefits

Fluent Bridging is a bridging loan broker, not a lender. We offer bridging and development loans from a comprehensive range of products and providers across the market from a carefully selected panel of lenders.

The loans we offer are both non-regulated and regulated, the latter applies when an applicants' home is being used as security for the loan.

Fluent Bridging provides a uniform advice process from application through to completion regardless of whether a loan is regulated or not, thus ensuring an identical journey for each type of customer.

Bridging loans are often used when a customer needs to pay for a new property while waiting for funds to become available from the sale of an existing property, known as 'chain-breaking'.

Timeframe from application to completion is traditionally much quicker than a mortgage / buy to let product where a deadline exists e.g., as a result of auction or pending repossession, bridging is often used whilst the long-term solution is being processed. This ultimately becomes the repayment vehicle or 'exit', for the bridging loan further down the line.

In real estate bridging loans are often used by people who are buying property that is not currently mortgageable, for example, if there is no kitchen, bathroom, or the target acquisition is in a poor state of repair.

Development loans can also be utilised when an applicant wishes to build a property (or properties). Structuring a loan in this way means that funds can be advanced in tranches as the build progresses, rather than entirely at the front end. The resultant interest saving of constructing properties in this way can be significant, as interest is only charged on funds physically released to the customer.

Case Management

Fluent Bridging incurs some of the application costs on behalf of the customer including automated valuations and property searches.

- Dedicated case managers are assigned to progress each application through to completion and liaise with the lender and connected third parties on behalf of the customer.
- The above tasks are carried out daily. Connected third parties include solicitors, valuers, quantity surveyors, lenders, agents, mortgage companies, etc.
- Customers are also able to access and use the MyFluent app, which allows:
 - Instant messaging between customer and case manager.
 - Secure upload of requested documents.
 - Application process tracking and push notification updates.
 - Display of key mortgage product data.
- Customers use biometric identification verification software to prevent application fraud.
- Electronic customer address verification to prevent fraud.
- Politically Exposed Persons (PEPs) and Sanctions screening via TransUnion, against recognised international databases.

3. Target market assessment and distribution strategy

This target market assessment matrix segments the target customers for the Product, recognising their different needs to enable you to tailor the services you provide when you distribute the Product.

Customer Circumstances	Distribution Strategy	Customer Needs & Objectives
<ul style="list-style-type: none"> • Customers who require short term finance (up to 24 months) secured on property in the UK. • Must be at least 18 years old. • Where funds are used for purchase, the customer must be able to demonstrate sufficient deposit or be able to offer additional property as security to make up a shortfall. • Must have robust and adequate exit strategy to repay the capital and interest applied at the end of the term. • Loan to value ratios are typically capped at 75%, however, 100% is achievable when using an additional property as security. • Clients can be non-resident, non-UK national, or ex-pat subject to the target property being in the UK. • Customers with adverse credit can apply for bridging finance. • Property development, and heavy refurbishments. • The range of applicants may include individuals, partnerships, or limited companies. 	<p>Our distribution strategy includes the following sources:</p> <ul style="list-style-type: none"> • Websites and aggregators platforms. • Broker referrals. • Database marketing. • Fluent websites. • Search engine optimisation (SEO). • PPC (pay per click) using key words pertinent to our target market. 	<p>The typical reasons customers apply for bridging loans are:</p> <ul style="list-style-type: none"> • Chain break (purchase a home whilst waiting for current property to sell). • Auction purchase where speed is required. • Non-mortgageable properties (no kitchen/bathroom, fire damaged etc). • Construction of new property. • Re-finance an existing bridging facility. • Adverse Credit repair/debt consolidation. • Probate funding to release funds prior to grant of probate.

The product is not designed for customers who:

- Are purchasing a property that is mortgageable and there are no time constraints on the client to complete.
- Wish to borrow money for a term of more than 12 months (regulated) or more than 24 months (non-regulated).
- Are not in the position to offer a property as security (although in the event of a probate application advances against a deceased's estate may be possible).
- Wish to borrow at a higher LTV than 75% without offering up additional security.
- May borrow more easily and cost-effectively from their first charge mortgage lender.
- May obtain required funds more cost effectively on an unsecured basis.
- Have no credible way of repaying a bridging/development loan within the specified timescale, be that by sale or re-finance.
- Are looking for unsecured borrowing or have no property of their own to offer up as security.
- Are looking to borrow less than £50k on a regulated basis or £25k on a non-regulated basis.
- Have a traditional mortgage coming to an end who haven't yet approached their mortgage lender for an extension to their facility.
- Customers who have adequate liquid resources e.g., cash or stocks/shares where accessing these would be considerably less expensive than the costs associated with a Bridging Loan.

4. Customers with characteristics of vulnerability

Our broking product is designed to cater for a wide target market, and not targeted specifically to meet any inherent characteristics of vulnerability in the target market. However, it is likely to be utilised by some customers with characteristics of vulnerability or who will experience vulnerability over time.

The product aligns with our vulnerable customer framework and aims to achieve fair value and good outcomes for customers who are vulnerable.

Full detail of our commitment to treating vulnerable customers fairly and appropriately can be found in our Vulnerable Customer Policy (FMG106).

5. Our assessment of value

We have developed a comprehensive and robust assessment process which evaluates several aspects of our business to determine the value of our broking product. This analysis is used to ascertain whether the Product delivers fair value for customers.

The outcomes of the assessment process are presented to the operating board on an ongoing basis, allowing for challenge and further investigation.

Benefits	Price	Costs	Limitations
<ul style="list-style-type: none">• The services and features that the product provides.• The quality of the customer service within the product.• The means with which we safeguard our customers.• Any other features that the product may offer.	<ul style="list-style-type: none">• The fees and charges customers pay for our product.• Comparable market rates.• Non-financial costs associated with operating the product.	<ul style="list-style-type: none">• The cost of providing the product to our customers.• Any other reductions in costs to the customer made possible by economies of scale.	<p>Any limitations on:</p> <ul style="list-style-type: none">• The scope and service we provide.• The features of the product.

Results of our assessment

Our assessment concluded that the Product continues to deliver fair value for customers in the target market for the Product.