

Product name: Non-Regulated Commercial Mortgages Range

Information sheet produced: July 2025

**Our approach to meeting the Products & Services Outcome and Price & Value Outcome – Information for distributors of the Product**

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 intermediary use only and should not be provided to customers.**

## 1. Summary of our assessment

We have assessed that:

- Our commercial product range 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

The products are designed to meet the needs of the target group, The product features and criteria are designed to support these needs.

Product Type	Product Specific Characteristics	Product Not Designed For:
<b>Fixed Rate Product</b>	<ul style="list-style-type: none"><li>• Offers a fixed rate of interest for an initial period, ensuring stable and predictable monthly payments.</li><li>• Available with a fixed initial period.</li><li>• Allows for overpayments (up to 10% of the outstanding capital balance per years) without incurring a penalty.</li></ul>	<ul style="list-style-type: none"><li>• Borrowing entities outside the UK.</li><li>• Loans secured on property outside the UK</li><li>• Business where there is a private equity house in place</li><li>• Individuals under 18 years of age.</li><li>• Customers intending to repay their mortgage or switch product before the end of their initial fixed rate period.</li></ul>

<b>Discount Rate Product</b>	<ul style="list-style-type: none"> <li>Offers a discounted interest rate lower than the Cumberland's Commercial Variable Rate (CVBR) for the term of the mortgage</li> <li>Annual overpayment allowance up to 10% of capital balance</li> </ul>	<ul style="list-style-type: none"> <li>Borrowing entities outside the UK.</li> <li>Loans secured on property outside the UK</li> <li>Business where there is a private equity house in place</li> <li>Individuals under 18 years of age.</li> <li>Customers intending to repay their mortgage or switch product before the end of their discounted tie in period.</li> <li>Those seeking predictability and stability of fixed monthly repayments during the initial loan period.</li> </ul>
------------------------------	---	--

### 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
Purchase a New Property	<ul style="list-style-type: none"> <li>Available through our Commercial Team directly &amp; Intermediary channels (Informed choice only)</li> </ul>	<ul style="list-style-type: none"> <li>To provide funds to purchase property.</li> <li>Open to customers who wish to have a repayment, Interest only or part of their mortgage on a capital and interest basis and part on an Interest Only basis.</li> <li>Access to a range of products to suit their financial objectives.</li> </ul>
Remortgage from another lender	<ul style="list-style-type: none"> <li>Available through our Commercial Team directly &amp; Intermediary channels (Informed choice only)</li> </ul>	<ul style="list-style-type: none"> <li>To provide funds to allow the customer pay off existing mortgage with another lender and move to us.</li> <li>Open to customers who wish to have a repayment, Interest only or part of their mortgage on a capital and interest basis and part on an Interest Only basis</li> <li>Access to a range of products to suit their financial objectives</li> <li>Available for customers who may want additional borrowing.</li> </ul>
Existing borrowers looking for a product switch	<ul style="list-style-type: none"> <li>Available through our Commercial Team directly &amp; Intermediary channels (Informed choice only)</li> </ul>	<ul style="list-style-type: none"> <li>Access to a range of products to suit their financial objectives</li> </ul>

Additional Borrowing	<ul style="list-style-type: none"> <li>Available through our Commercial Team directly &amp; Intermediary channels (Informed choice only)</li> </ul>	<ul style="list-style-type: none"> <li>Access to a range of products to suit their financial objectives</li> </ul>
----------------------	---	--

## 4. Customers with characteristics of vulnerability

The Product is designed for customers who would benefit from a fixed monthly repayment for a defined period of time, which is likely to include some customers with characteristics of vulnerability or who will experience vulnerability over time.

Younger customers or First Time Buyers are potentially less likely to have a comprehensive understanding of mortgages or the current mortgage market. Therefore, they may require additional advice and support to ensure they understand the information being presented to them and the implications of the arrangement they are entering into to reduce the risk of harm occurring.

We considered the needs, characteristics, and objectives of customers with characteristics of vulnerability at all stages of the design process for this Product to ensure the Product meets their needs.

We have also tested the Product to assess whether it will meet the identified needs, characteristics, and objectives of the target market, including customers in the target market who have characteristics of vulnerability.

We have a business framework to achieve good outcomes for vulnerable customers, which includes:

- Group training to ensure colleagues have the knowledge and skills in relation to identification, treatment and consideration of customer vulnerability.
- Defined processes for tracking, review, contact strategy, desired outcome and data update.

Intermediaries should continue to comply with your obligations to ensure that you treat customers in vulnerable circumstances fairly.

Please contact us if you need any further information about how we support the needs of all our customers in relation to the Product.

## 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 mortgage product. This analysis is used to ascertain whether the Product delivers fair value for customers.

The outcomes of the assessment process are presented to our Product & Pricing Committee allowing for challenge and further investigation before we sign-off the outcomes and share the summary of our assessment with you.

Our fair value assessment has considered the following:

Benefits	Price	Costs	Limitations
The range of features that the products provide, the quality of the products, the level of customer service that is provided and any other features that the products mat offer.	The interest rates, fees and charges customers pay for the products, comparable market rates, advice fees paid to the intermediaries and non-financial costs associated with operating the products	The cost of funding the products	Any limitations on the scope and service of the product or 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.

Information correct: **July 2025**