

February 2026 v1

Target market and fair value assessment summary

This document is intended for financial intermediaries only
and is not approved for use by retail clients.

**Information for distributors of the product: Our approach to meeting the
Products & Services Outcome and Price & Value Outcome under The
Consumer Duty.**

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'.

1. Summary of our assessment

We have assessed that:

- Our lifetime mortgage meets the needs, characteristics, and objectives of customers in the identified target market.
- The intended distribution strategy is 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. Target market summary

2.1 Eligible customers:

- individuals or joint borrowers;
- youngest customer between the ages of 55 & 84;
- UK citizen, or non-UK citizen with the right to reside, with their main residence in England, Wales or mainland Scotland;
- own their property with a mortgage or unencumbered, or making a property purchase;
- possess an eligible property within our defined lending criteria;
- require a lump sum amount or a facility to draw on over time;
- taking funds for a reasonable purpose and with the intention of this being long-term borrowing. Use of funds can include (not an exhaustive list):
 - repayment of an existing mortgage or other debts;
 - gift to family;
 - making home improvements;
 - enhancing or maintaining lifestyle (e.g. holiday); or
 - settling a divorce.
- taking funds with the expectation of not making payments to incur an Early Repayment Charge (ERC); or
- sometimes making periodic or ad hoc payments within the ERC allowance.

2.2 Ineligible customers:

- below the age of 55;
- can meet their financial objectives without the need to release equity from their home and allow the balance to compound over time e.g. they can borrow through a standard mortgage or other loan and make the necessary repayments;
- wish to borrow for a short-term period where they would incur lower early repayment penalties;
- have or may have alternative financing available, such as inheritance or long-term savings; or
- wish to borrow to make unusual or ill-informed investment decisions including but not limited to gambling purposes or the purchase of cryptocurrency.

2.3 Key lending features:

- minimum property value of £125,000;
- minimum loan amount of £20,000;
- property is located in England, Wales or mainland Scotland;
- property is for residential use and is a house, bungalow or flat; and
- meets Riverton's lending criteria which includes (not an exhaustive list):
 - traditionally built property;
 - properties not negatively affected by environmental perils or locational factors; and
 - properties without any significant defects.

See the lending policy on the website for more detailed information.

3. Product features and benefits

The product is designed to meet the needs of the target market, as detailed above in section 2. The product features are designed to support those needs.

Product feature	Detail and benefit
Access to a cash lump sum	The cash lump sum enables the customer to fulfil a financial goal which might help them to: <ul style="list-style-type: none">• undertake home improvements;• repay debts which are causing concern;• improve their lifestyle; or• help family members.
No contractual repayments	The customer is not burdened with having to make contractual repayments which will provide a degree of financial freedom.
Limited/no upfront fees	No arrangement fee or valuation costs. All Riverton costs are clearly presented with no hidden charges. There are no ongoing fees that need to be paid through the life of the loan, with all monies owed at the end usually after the last death or entry into long-term care, paid through the sale of the house.
Fixed interest rate	Fixed interest rate for the life of each loan meaning it will stay the same even if interest rates rise or fall in the future. A fixed interest rate is easier to understand and can be clearly documented and displayed in the customer documentation including the Key Fact Illustration (KFI) and Offer document to show what is owed and when.
Fixed Early Repayment Charges (ERC)	The fixed percentage provides clarity. The customer will know how much will need to be paid when and this is also shown to them in the KFI and Offer document.
Porting	Ability to move the mortgage loan to another property, subject to the new property meeting the lending criteria.

Downsizing protection	If the customer moves to a new property of lower value, the customer must make an overpayment to maintain the existing loan to value (LTV), but no early repayment charge will be incurred.
ERC waiver on 1st death	If a joint life mortgage, where the first customer dies or goes into long-term care then the remaining customer can pay off the loan in full, within 3 years and not incur any ERC.
No Negative Equity Guarantee	The guarantee that the customer will never owe more than the property is worth, less the sales costs of the estate agent and legal fees. This provides benefit to the customer and the peace of mind that there will be no additional debt that needs to be paid by the beneficiaries.
Tenure for life	Ability to stay in the property until death or entry into long-term care, even if the balance owed is more than the house is worth.
Clear and transparent communication	Communication provided is clear and with the fixed interest rate and the fixed ERC so the customer can clearly see how much is owed when.

4. Distribution strategy

- A customer must receive advice from a qualified adviser/mortgage broker for any new loan and any further advance.
- All advisers/mortgage brokers must hold the appropriate FCA and Equity Release Qualifications.
- The advice firm must undertake their own fair value assessment regarding the products that they advise on.
- The Riverton product is available to selected approved firms, networks and mortgages clubs.

5. Customers with characteristics of vulnerability

The target market for lifetime mortgages includes and is more certain to contain customers with possible characteristics of potential vulnerability, which may develop over time especially due to their age and stage of their life. Vulnerability also extends beyond the customer and to their beneficiaries, especially when they are dealing with the sale of the property post death or entry into long-term care.

Riverton has a Customer Outcomes and Vulnerability Policy which outlines our approach and standards to achieve good outcomes for all our customers. It provides guidance on how to recognise, identify and record their vulnerability and sets out our arrangements to ensure customers with vulnerable characteristics, or circumstances, get the right support and protections.

The Policy also sets out how we monitor vulnerability within our mortgage customer demographics and the controls in place to ensure vulnerabilities are correctly identified and treated.

Our overarching objective in relation to vulnerability is to ensure that a vulnerable mortgage customer has the same positive outcomes and high service standards as a mortgage customer who is not vulnerable.

Lifetime mortgages are complex products and advisers should have their own policies in place to identify vulnerability and support customers accordingly. Advisers should ensure that all customers fully understand the product, and the associated risks and limitations.

The customer is required to seek independent legal advice and obtain formal certification. This ensures the customer understands their rights, obligations, and risks before signing the loan documentation and completing.

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

6. Our assessment of value

We have a comprehensive and robust fair value assessment framework, which considers the following:

6.1 Price analysis

This considers:

- main fees and charges;
- interest rates;
- adviser fees paid by Riverton;
- early repayment charges;
- loan to values;
- minimum loan balances; and
- tariff of charges.

The assessment concludes that the fees associated to the product are deemed to be fair. The charging structure does not consider the adviser's own fee due from the customer which is payable upon completion however these are monitored but the firm should have assessed their own fair value.

6.2 Customer benefit analysis

The product provides many benefits to the customer and are as expected for the target market and provides the customer with what they need. The benefits extend beyond finances, and the product provides many non-financial benefits including financial freedom with no regular repayments required, and the ability to remain in their home.

6.3 Cost and profitability analysis

Fees and charges are fair and show that we are not operating at any excessive margin at the detriment of the customer.

6.4 Distribution

The distribution of the product through fully qualified advisers is suitable, especially considering the target market and increased potential vulnerability.

Results of our assessment

Our assessment concludes that the product delivers fair value for customers in the target market. We will continue to regularly review and make enhancements to the product where necessary and any changes will be communicated accordingly.