

Value Assessment

Name of product / service	Residential First Charge Mortgage Packaged Service
Assessment reason	Annual Review 2026

Service description
▪ An initial meeting/discussion with Broker (Packaged). ▪ Fact-finding and information gathering. ▪ Research using a sourcing system or manual sourcing using lender product/criteria guides and industry knowledge. ▪ Terms presentation to Broker based on individual circumstances. ▪ Application/documentation checking and support. Lender case submission and updates. ▪ Post offer support – liaising with Lender, Valuer or Solicitor.

Target Market
▪ New or existing customers looking to purchase or re-mortgage their residential property who are aged 18 yrs or over, at the time of application which are ruled out of accessing mainstream lenders. ▪ Clients who may have a history of defaults or poor credit, a low credit score, unusual income types, or non-standard property construction. ▪ First time buyers, home movers or customers looking to obtain funds for home improvements, debt consolidation or larger loans or longer terms, outside unsecured limits.

Limitations
▪ No access to direct to customer rates ▪ Clients who do not meet the lending criteria of any of our panel of lenders. ▪ Clients who are unable to demonstrate they have the means to repay the proposed loan. ▪ Clients who have been convicted or suspected of fraud or fail AML verification checks ▪ Clients who fall below the expected minimum equity amount, e.g. with an LTV of 98% or higher may be excluded from lender. ▪ Clients who have properties overseas. ▪ Customers who hold a Power of Attorney which has not been sealed by the Courts.

Remuneration
▪ Crystal Specialist Finance charges no upfront fees. ▪ Broker fee of £1,995, which is a flat fee only payable on completion. ▪ Procuration fee - commission paid to Crystal Specialist Finance from lender. Our assessment of our Service charge within the Distribution Chain has been determined to offer Fair Value for the service and benefits we can provide.

Market research when designing service
Our service is not priced significantly higher or lower than other comparative services offered in our market. On some occasions we are able to attract exclusive and semi-exclusive products and access lenders and products unavailable if access to them is attempted directly. We have assessed our competitors and sought feedback from our introducers and lenders across all lending disciplines that are captured by the Duty and are satisfied our service is fit for purpose.

Value/Benefits
▪ Knowledgeable staff who have the ability to assess and apply lender criteria effectively. ▪ Specialist staff who understand lender criteria and the implication of poor credit on assessments. ▪ Experienced staff with wide mortgage market exposure. ▪ High quality and accessible customer service which ensures applications are processed efficiently. (including direct telephone lines and online services). ▪ Explanation of the effect and impact of adding mortgage fees to the loan. ▪ Explanation of the effect and impact of paying a product fee. ▪ Access to sourcing systems which allow comparison of a wide range of mortgage products. ▪ Access to third party professional support, e.g. surveyor and solicitors (e.g. during re-mortgage or transfer of equity and assistance with appropriate legal representation). ▪ Enhanced relationships with lenders from senior management through to underwriters so that applications can be considered on a case-by-case basis. ▪ Semi-exclusive product offerings from specialist lenders. ▪ Access to third party referral around ancillary services (signposting), GI, protection to support mortgage obligation.

Behavioural biases present
None exist which may lead to harm in relation to the Service we offer within the Target Market. We do not inappropriately manipulate or exploit retail customers, through behavioural biases to mis-lead or create a demand for a product. Where debt consolidation is discussed by the broker the best interest of the customer are expected to be considered and disadvantages regarding additional interest and/or equity erosion etc. explained. Similarly, where fees are added to a loan, additional interest costs are expected to be clarified. We will assess the client's case on the individual's circumstances and merits provided to us and base our information on those findings (where appropriate).

Characteristics of vulnerability
Our first charge mortgage broking service is designed to cater for a wide Target Market. It is not targeted specifically to meet any inherent characteristics of vulnerability in the Target Market. It is, however, likely to be utilised by some customers with characteristics of vulnerability or those who will experience vulnerability over time. Situations where customers experiencing vulnerable circumstances may receive compromised value of the service may include: ▪ Lack of knowledge and experience (low level of financial sophistication). ▪ Reduced financial resilience (low income, defaults in the past and/or still evidence of credit issues). ▪ Historical adverse which could indicate lower capability. ▪ Poor language skills and/or digital exclusion. ▪ Age related. We will therefore adapt our service according to the needs of customers and in line with our Vulnerable Persons Policy and aim to achieve Fair Value and good outcomes for customers who may be vulnerable.

Total cost a client might pay
When assessing our Service to ensure it provides Fair Value, we considered the total charge the customer may pay across the Distribution Chain. This can vary quite significantly depending on the rate options offered by the specific lender, product fees and other third-party fees. Through knowledge of lender value assessments, we look to understand how the products we recommend deliver value and the cumulative impact of costs across the chain.

Summary of our assessment	
We have assessed that: ▪ Our first charge mortgage 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).	
We have developed an assessment process which evaluates several aspects of our business to determine the value. This analysis is used to ascertain whether the Service delivers Fair Value for customers. The outcomes of the assessment process are presented to the Executive Committee on an ongoing basis, allowing for challenge and further investigation.	
Our assessment concluded that the Product continues to deliver Fair Value for customers in the Target Market for the Product.	
Actions required	No
Next review date	31/03/2027 or earlier if external factors support this