

# Regulated First Charge.

Fair Value Assessment  
26<sup>th</sup> February 2026

## Our Approach to Product Governance and Fair Value Assessment – Information for Distributors of the Product.

Together is committed to conducting its business in a fair, honest and open manner and we ensure that we have appropriate product oversight and governance systems and controls in place to offer products that have been assessed as providing fair value to customers that are within the appropriate target market.

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

### 1. Purpose of the Assessment

This Fair Value Assessment (FVA) is conducted in line with the FCA's Consumer Duty (PRIN 2A) to ensure that Residential Regulated First Charge product delivers fair value to its target customers. The assessment evaluates:

- Whether the costs and charges are proportionate to the benefits.
- If the product is suitable for its intended target market.
- Whether it meets customer needs and delivers good outcomes.
- How it compares to alternatives in the market.
- Whether distribution and intermediary remuneration create any conflicts of interest.

This assessment uses a combination of internal data, competitor benchmarking, customer feedback, and arrears/default analysis to ensure continued fair value for consumers.

### 2. Product Summary and Target Market

#### Product Features and Benefits

Feature	Details
Loan Type	Fixed, Discounted and Variable Rate
Term	Mortgage Term up to 40 Years
Loan-To-Value (LTV) Range	Up to 75%
Repayment Type	Capital Repayment and Interest Only
Product Features	Accepted on Right to Buy and Shared Ownership Non-Standard Properties Accepted Minimum Loan Size £50K Gifted Deposits Considered from Close Family Joint Borrower Sole Proprietor 100% Benefits Income Accepted Foster Care Income Accepted
Product Limitations	This product is not suited to customers who fall outside the target market.

Full eligibility criteria can be accessed on our intermediary website via the link below:  
<https://togethermoney.com/intermediaries/our-products>

## Target Market

This product is designed for **First-time Buyers, Home Movers and Remortgages**, specifically:

### **Applicants looking to purchase a residential property to live in –**

- To support first time buyers getting on the property ladder.
- To purchase with the intention to live in the property.
- To purchase a property that is non-standard in construction.
- To purchase a RTB or Shared-Ownership property without a deposit.
- To support customers looking for a capital and repayment loan.
- To support clients looking to purchase using an interest only loan and use downsizing, endowment policies or stock and shares ISAs as their repayment strategy.
- To support customers with income not accepted by the high street (one-year self-employed income, benefits, foster care income).
- To support customers seeking a fixed rate product that provides surety of payment for an initial period.
- To support customers seeking a variable rate product, that allows the repayment of a loan without incurring early repayment charges.
- To support customers looking to purchase a second home.

### **Applicants looking to refinance their main residential property to repay an existing loan, or raise funds for a specific loan purpose –**

- To refinance a property that is non-standard in construction.
- To support customers with income not accepted by the high street (one-year self-employed income, benefits, foster care income).
- To support customers seeking a fixed rate product that provides surety of payment for an initial period.
- To support customers looking for a capital and repayment loan.
- To support clients looking to remortgage on an interest only loan and use downsizing, endowment policies or stock and shares ISAs as their repayment strategy.
- To support customers looking to raise funds for home-improvements.
- To support customers looking to raise funds for debt-consolidation.
- To support customers seeking a variable rate product, that allows the repayment of a loan without incurring early repayment charges.

### **Customers for Whom This Product is Not Suitable**

- Are Non-UK Residents
- Have more than 3 Demerits
- First Time Buyers with Declining Unsecured Credit
- Require Part and Part Mortgages
- Require a Loan Amount under £50K

### **Vulnerable Customer Considerations**

The product is designed for residential mortgage customers, which is likely to include some customers with characteristics of vulnerability or who will experience vulnerability over time.

Together recognises that some customers we come into contact with will be vulnerable in the context of how we interact with them because of their personal circumstances. As a provider of secured lending, we have a duty and obligation to make sure that all of our work

is consistent with our purpose and that we make reasonable adjustments and put in place appropriate support mechanisms to ensure our vulnerable customers receive positive outcomes and receive consistently fair treatment.

In order to achieve this, we are committed to:

- Ensuring colleagues have the right skills and capability to recognise and respond to the needs of vulnerable customers.
- Responding to customer needs through product design, flexible customer service provision and communications to deliver good customer outcomes.
- Monitoring and assessing whether we are meeting and responding to the needs of vulnerable customers and making improvements where this is not happening.
- 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.

### 3. Distribution Strategy & Fair Treatment of Customers

#### Distribution Channels

- Direct Sales
- Online Channels
- FCA Authorised Intermediaries
- FCA and Non FCA Authorised Introducers

#### Remuneration & Conflicts of Interest

- Broker commissions are reviewed to ensure they do not incentivise unsuitable sales.
- Fair remuneration structures in place for internal sales teams and third-party brokers.

#### Ensuring Good Customer Outcomes

- Clear and accessible information provided pre-sale and post-sale.
- Suitability checks conducted to ensure customers are offered the right mortgage product.
- Support for vulnerable customers with extra guidance and financial difficulty assistance.

**Conclusion:** The product is distributed responsibly, ensuring fairness, transparency, and no conflicts of interest.

### 4. Ongoing Monitoring & Fair Value Review

#### Data Sources for Continuous Review

- Customer complaints analysis to identify potential fairness issues.
- Monitoring arrears/default rates to assess product suitability over time.
- Regular competitor benchmarking to ensure continued fair pricing.
- Customer feedback and market research to validate perceived value.

#### Triggers for Review

- Annual reviews to ensure the product remains competitive and provides fair value.
- Regulatory or market changes requiring pricing or feature adjustments.
- Increase in complaints related to fees, affordability, or customer experience.

## Potential Adjustments Based on Findings

- Adjusting fees or interest rates to remain competitive and fair.
- Enhancing transparency in documentation to improve customer understanding.
- Strengthening affordability criteria to prevent potential consumer harm.

Benefits	Price	Costs	Limitations
<p>The product supports a customer base requiring finance within the specialist lending sector by allowing criteria not accepted by high street mortgage lenders.</p>	<p>Policies in place to ensure products are priced fairly, in comparison to competitors and assessed regularly. The policies ensure the approach when pricing decisions are made are consistent and compliant.</p> <p>When determining price, we consider rate, customer risk profile, a reasonable pre-estimate of early redemption and longer term economic and financial assumptions.</p> <p>An overall cost comparison detailing Annual Percentage Rate of Charge is available for customers explaining how pricing affects their payments.</p>	<p>Our policies are designed to ensure customers are charged fees that are a fair reflection of the market and our cost to do business.</p> <p>Our costs include.</p> <ul style="list-style-type: none"> <li>• Cost of funds - reflects our cost to acquire funds to lend.</li> <li>• Cost to sell – reflects cost to sell products and includes broker commission and advertising.</li> <li>• Cost to process – reflects the cost to process and underwrite applications.</li> <li>• Cost to service – reflects cost to maintain and support customers throughout the course of their loan.</li> </ul>	<p>This product is not suited to customers who fall outside the target market for this product.</p>

## 5. Conclusion

### Overall Fair Value Conclusion

The Regulated First Charge product provides fair value to its target market. The pricing, benefits, and distribution model are appropriate, and no evidence suggests the product leads to **poor consumer outcomes**.