

Dear Mrs Gough-Williams

Further to our telephone conversations today, I'm writing with regard to your request to transfer your HL SIPP to the ZICO OTS Ltd Pension Scheme.

We are currently unable to proceed with your transfer request. This is because we are concerned that the receiving scheme may operate in a way which is not consistent with HM Revenue & Custom pension rules. Our specific concerns are:

- The principal employer, ZICO OTS Ltd, of the ZICO OTS Ltd Pension Scheme has never traded and shortly following the registration of the ZICO OTS Ltd Pension Scheme filed accounts for a dormant company;
- HMRC have the power to deregister a pension scheme where the principal employer has been dormant for a period of one month during the previous 12. As such there is a possibility that HMRC may have begun the process of deregistering the ZICO OTS Ltd Pension Scheme;
- The ZICO OTS Ltd Pension Scheme rules refer to pension rules that were repealed prior to the setting up of the ZICO OTS Ltd Pension Scheme.

Should the ZICO OTS Ltd Pension Scheme be acting in a way which is not consistent with HMRC rules there is a risk that HMRC will deregister, or already has deregistered, the pension scheme under section 157 of Finance Act 2004. If we were to transfer to a pension scheme which has been deregistered this would be an unauthorised payment and you would be liable for an unauthorised payment charge of up to 70%.

To mitigate this risk we will be contacting HMRC for confirmation that the scheme is registered with HMRC and is not subject to a deregistration notice. HMRC have advised that it may be several months before we receive any response. Please note that this request for information is different to the certificate you have already provided which shows that HMRC did register the scheme on 23 January 2019 but not that it currently is registered or not subject to the deregistration process.

If you have not yet taken independent financial advice from a financial adviser authorised by the Financial Conduct Authority I would strongly recommend you do so before deciding how to proceed. If you need help in finding a regulated adviser, please visit www.unbiased.co.uk.

I would also ask you to call the Pensions Advisory Service (TPAS) who give free and impartial guidance on the risks of pension scams and whose details are available from www.pensionsadvisoryservice.org.uk

I trust you understand our need to ensure payments made from the HL SIPP are legitimate and will not result in tax penalties for either you or ourselves, however please contact us on 0117 980 9926 or at sipp@hl.co.uk if you have any queries.

Kind regards

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This email isn't personal advice. If you're at all unsure about your decisions, seek advice.