

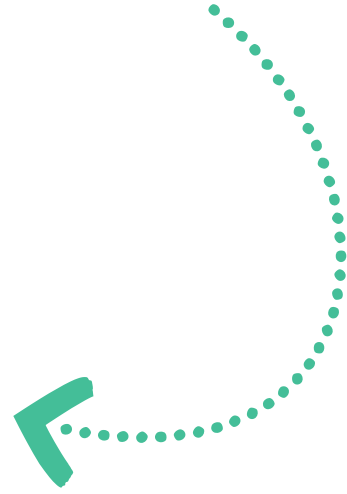
HUB FINANCIAL SOLUTIONS PERSONAL PENSION

KEY FEATURES



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The HUB Financial Solutions Personal Pension (the Account) is provided by and through the platform operated and administered by Embark Investment Services Limited, company number 09955930, (the ‘Embark Platform’). Embark Platform is a trading name of Embark Investment Services Limited, a wholly owned subsidiary of Embark Group Limited. Embark Investment Services Limited is incorporated in England and Wales (company number 09955930) with its registered Office at 100 Cannon Street, London, EC4N 6EU. Embark Investment Services Limited is authorised and regulated by the Financial Conduct Authority (Reg No 737356). The Financial Conduct Authority is a financial services regulator.

We are required to give you this important information to help you to decide whether this Account is right for you.

You should read this document carefully so that you understand what you are buying, and then keep it safe for future reference.

If you have any questions or there is anything you do not understand, please speak with your financial adviser.

HUB Financial Solutions Limited is a UK registered company and forms part of the Just Group plc group of companies.

The Account provides access to a wide range of investments that help to build your retirement savings. You can then take these savings how and when suits you (subject to Government rules and regulations). Your financial adviser will help you to decide if this Account is right for you.

If you are a parent or legal guardian of a child under the age of 18, you can also apply for a Personal Pension Account on their behalf. We call this a Junior Personal Pension. All information in this document also applies to HUB Financial Solutions Junior Personal Pensions. Where we use the term ‘you/your’, where applicable this also refers to ‘your child’.

Where this document uses the following terms:

‘You’ or ‘your’ means you as the holder of a HUB Financial Solutions Investment Service Account.

‘Us’, ‘our’ or ‘we’ means HUB Financial Solutions Limited, company registered number 05125701 and FCA register number 455713.

‘Agent’ Means means your Financial Adviser or HUB Financial Solutions Limited, company registered number 05125701 and FCA register number 455713.

ITS AIMS



What does it do for you?

Builds up a sum of money, in a tax-efficient way, to help you meet your future retirement needs.

You achieve this by investing. A Personal Pension gives you access to a wide range of investment options, such as Mutual Funds, and Exchange-Traded Investments.

You and your financial adviser can choose which investments are right for you, based on your retirement needs and your attitude to risk.

Finally, when you decide the time is right (and Government regulations allow) you can access your savings in a number of different ways to suit your income needs. Unless special circumstances arise, you will be eligible to access your pension from the age of 55.

YOUR COMMITMENT



What we need you to do

Take time to read the information in this document about the Account, including its features and risks, and any other documentation we provide either directly or through your financial adviser.

With your financial adviser regularly review the contributions you make, your investment approach, and any income you are taking, to make sure your Account meets your future income needs.

Make sure we always have up-to-date information about you. You should tell us when your circumstances change, for example, if you move house or you change your bank account or your country of tax residence.

Keep an ongoing relationship with a financial adviser who has an appropriate agreement with us. They will provide you with advice and take responsibility for setting up and administering the Account on your behalf.

You should review the investments held in your Account on a regular basis and speak with your financial adviser about their performance, taking into account your financial goals and risk profile. You should consider getting advice whenever your circumstances change and before you take money out of your Account.

Where applicable, view investments as being for the long term and remember that you won't ordinarily be able to take money out of your Personal Pension until you are at least 55 years of age.

Agree with your financial adviser how you will pay them, or their associates, for their services to you. This will be the adviser charge. You can authorise us to deduct the adviser charge from your Account and pay it to them.

Withdraw money from your Account only in ways that are allowed under the pension and tax rules that apply at that time.

Provide us with an email address that you access regularly, where we can send notifications in respect of your Account.

RISKS



The things that could go wrong

The value of your Account depends on the performance of the investments you and your financial adviser choose to invest in. The value of these investments, and therefore your Account, can go down as well as up and you may get back less than you put in. Your retirement benefits are not guaranteed.

The level of risk and potential investment performance depends on the investments you invest in. Past performance of these investments is not a guide or guarantee of how they will perform in the future.

Many of the investments available to you are intended as medium to long term commitments. If you take money out early, you may not get back the full amount you invested.

Investments in property funds can be difficult to sell. You might not be able to sell them when you want. The valuation of property is a matter of opinion rather than fact.

When you want to buy or sell shares there may not be a market for the shares you are interested in.

If you opt to cancel your Account you could get back less than you invested. If you cancel a transfer from another provider to us, the other provider may refuse to accept the return of the transfer money. If this happens, you should discuss the options you have with your agent.

The HUB Financial Solutions Personal Pension allows income to be taken from Flexi-Access Drawdown. Taking income in this way may have implications on the maximum level of contributions you can make in the future. If you intend to continue making contributions after taking Flexi-Access Drawdown, you should discuss this with your financial adviser.

Your retirement income could be less than you expect if investment growth over the lifetime of the Account, annuity rates at the time you take your benefits, or both, are lower than expected. The retirement income could also be less if you reduce or stop payments to your Account.

If you receive means-tested benefits, taking an income from your Account might mean they are reduced or stopped.

Any charges we apply to your Account will affect the value of your Account. These charges may vary from time to time. You can find more information about our charges and the financial adviser charges, and how we apply them, in the Client Charges Guide. When a charge is taken from your Account you will receive confirmation details in the Charges Investment Document that we issue.

If we cannot take any charges or other payments from your Account due to insufficient cash, we may need to sell some of your investments to meet these.

If you decide to leave us as your agent and do not appoint a new one, your options to manage the Account may become restricted. This could lead to poor financial outcomes. If you transfer money into your Account from another pension plan, the final pension benefits you receive could be less than if you stayed in your existing scheme. A financial adviser will be able to advise whether a transfer is in your best interests. They will also make clear any benefits you may be giving up such as 'enhanced protection' or 'fixed protection'. It is advisable to speak with a financial adviser before making any transfer decisions.

Over time, inflation will reduce the buying power of the money you have saved. For example, if inflation is 2% pa, then in 20 years' time £10,000 will only buy the equivalent of what £6,676 buys today.

Your Account value may not be large enough to provide income for as long as you intended, in instances where you take a higher than planned level of income (for example as Drawdown Pension) over a long period of time.

If you take a large proportion of income in a short period you may end up paying a higher rate of tax than usual.

To provide the same long-term income as buying an annuity, your Account will need to grow by more than the interest rate used to calculate the annuity. This higher growth rate is called the critical yield. Your retirement illustration will show critical yields for different periods and you should discuss them with your financial adviser.

QUESTIONS AND ANSWERS

Q Who can invest?

A To open an Account you must:

- be aged 18 or over
- be resident in the UK for tax purposes
- have appointed HUB Financial Solutions as your agent.

If you are a parent or legal guardian of a child under the age of 18, you can also apply for a Personal Pension Account on their behalf. We call this a Junior Personal Pension. All information in this document also applies to Junior Personal Pensions.

Q Is this the right option for me?

A The Account could be right if you:

- are willing to invest your capital over the medium to long term, understanding that you may not be able to take money out until you are at least 55
- want to benefit from tax relief on your contributions, subject to Government limits
- want access to a wide range of investments and understand and accept the associated risks
- want flexibility on how and when you take your retirement benefits
- want a way to consolidate your other pension savings and start taking retirement income
- are prepared to maintain an ongoing relationship with HUB Financial Solutions.

Note: the HUB Financial Solutions Personal Pension is not a stakeholder plan. Stakeholder plans are generally available and may meet your needs as well as this Account.

Your agent will help you to decide whether the Account is right for you. They will also help you to understand how applicable tax and pension regulations could affect your choices.

Q How do I start saving in a Personal Pension?

A You can start saving in a Personal Pension once you and your agent decide it is the right product for your needs. Once you have agreed to the recommendation, your agent will then set up the Account for you in accordance with the Client Terms & Conditions (these contain the specific personal pension terms).

You, your employer, or another third party acting on your behalf can then make payments into your Account.

Q How much can I save in my Personal Pension?

A A Personal Pension can be started with a minimum payment of £50 paid regularly or as a one-off. There is no maximum limit on how much you can put into your Account but there are limits on the amount of contributions that are eligible for tax relief. It is advisable to ask your financial adviser to explain how your contributions benefit from tax relief and any limits that apply. More information about this and the Annual Allowance limit can be found in the What About Tax section.

The following types of payments can be made into your personal pension:

- Regular contributions (monthly, quarterly, half-yearly and yearly)
- One-off contributions
- A transfer of investments from an existing third party pension arrangement.

There is also a choice of ways to make these contributions:

- by Direct Debit
- electronically by debit card.

Once you have made payments into your Account, you will not be able to access them until you reach age 55 years.

Q Can I transfer in the value of other pensions?

A Yes. We recommend you speak with your agent to find out if the pension you want to transfer is accepted by us. They will be able to advise as to whether or not transferring is the right option for you, along with the benefits and risks involved.

If you do transfer, we will normally receive the money from your registered pension scheme into your Account with us in one of two ways:

- as a cash transfer
- as a re-registration of investments.

A re-registration transfer can only happen if your Personal Pension offers the same type of investments that you have in the existing pension scheme. Your financial adviser will be able to check this for you.

If your pension with another provider is being used to provide a Capped Drawdown Pension then when you transfer your pension to us the pension will be converted to a Flexi-Access Drawdown Pension.

More information on the types of transfers available can be sourced from your financial adviser or in our Client Terms & Conditions.

Q What are the charges?

A The following shows the type of charges that could be applied to your Account depending on the services you choose to buy. Charges are deducted from the 'available cash' part of your Account. You can find a more detailed description of our charges in our Client Terms and Conditions. To find out the actual charges you should refer to the Charges Guide and your Key Features Illustration.

Initial charges, include an:

- initial adviser charge.

Ongoing and ad-hoc charges, include a/an:

- service fee
- drawdown charge
- ongoing adviser charge;
- initial discretionary investment manager charge;
- ongoing discretionary investment manager charge;
- ad-hoc adviser charge;
- applicable Stockbroker Partner charge.

Q What might I get back?

A Your financial adviser will give you, and discuss, an illustration provided by us showing what you might get back when you decide to take your benefits. This is based on a number of assumptions, including:

- amount invested
- performance of your investments
- effect of charges
- amount of any cash lump sum you take
- amount of drawdown income you take
- annuity rate that applies at the time
- effect of tax
- your chosen retirement date.

It is important to remember that the material effect of these assumptions will only be known at the date you decide to take your benefits, together with other factors such as inflation.

Q How will I know how my Account is doing?

A There are several ways you can keep up-to-date with how your Account is performing:

- you can obtain an up-to-date valuation of investments at any time by signing in to your Account online. You will be required to supply an email address when you apply for the HUB Financial Solutions Personal Pension. These details will be used to provide you with a secure user name and password. You can find out more in the Managing Your Account section.
- we provide you with a statement every three months showing the value of the investments in your Account, what it is likely to be worth in the future and any income you have taken (if your pension is in drawdown). The first statement will be issued three months after you open your Account and will be placed in your Document Library.
- you can ask your agent for an up-to-date valuation at any time.

What about tax?

Q How are contributions affected by tax?

A If you are under the age of 75 and eligible to receive tax relief, the Government will pay an amount equal to the basic rate of tax to each contribution you make. The tax relief you receive might be different depending on whether your main residence is in England/Northern Ireland, Scotland or Wales.

If you are eligible to receive tax relief we will automatically add an amount equivalent to the basic-rate of tax to your Account when you make a contribution. We will then claim the amount back from HM Revenue and Customs (HMRC).

You will not receive tax relief on any transfers or contributions made by your employer. However, your employer may be entitled to claim tax relief.

If you are a higher rate or additional rate taxpayer, you can claim extra tax relief on your personal contributions directly from HMRC as part of your annual tax return. This additional relief is not added to your Account by us.

There is a limit set by HMRC on the amount you can contribute to your Account that will benefit from tax relief (your Annual Allowance). Your own contributions will only attract tax relief on an amount of £3,600 (including the applied relief) or 100% of your UK relevant earnings if greater. Where total contributions to all of your registered pension schemes (including basic-rate tax relief) exceed your Annual Allowance in any given tax year, you will have to pay a charge on the excess (known as annual allowance charge).

The Annual Allowance for 2020/2021 is £40,000 but there are circumstances when this may be lower. Your Annual Allowance is also likely to be reduced if you are a high earner. If you have flexibly accessed any of your pensions and triggered the Money Purchase Annual Allowance this will also limit the tax relief on your contributions. Please contact your financial adviser for more information.

The amount of the Annual Allowance charge is set at your marginal tax rate.

Q How are investments affected by tax?

A Growth in the value of your Personal Pension is free from capital gains tax. UK dividend distributions are paid net of a 10% non-reclaimable tax credit. There is no further tax to pay on these. Certain types of income distributions paid to the Personal Pension are free from income tax.

Q How are retirement benefits affected by tax?

A Any benefits you take from your HUB Financial Solutions Personal Pension (after any tax-free allowance) will be subject to income tax. The level of tax you pay will depend on your circumstances.

HMRC applies limits to the amount of benefits you will be able to take before tax penalties apply. The rules and limits that apply may be different when you come to take your benefits. You should therefore discuss your options and the effect of any tax with your financial adviser at that time.

You may also be able to take some of your savings as a lump sum, where usually up to 25% is tax-free. You can find out more in our Client Terms and Conditions.

The lifetime allowance is the limit set by the Government on the value of funds you can accrue (build up) in all registered pension schemes that you are a member of, before additional tax charges apply.

When you take the benefits from your Account, the fund will be tested against the lifetime allowance and you may have to pay additional tax on the excess. This does not include any state retirement pension, state pension credit or dependant's pension you may be entitled to. This may not apply to you if you have previously taken Enhanced Protection.

For more information on the Lifetime Allowance and Annual Allowance limits, visit [hmrc.gov.uk/tax-on-your-private-pension](https://www.hmrc.gov.uk/tax-on-your-private-pension) or speak with your financial adviser. You should also ask your financial adviser about any Fixed Protection, Individual Protection or Enhanced Protection you may have.

Q Managing your Account

A Your Account is set up and managed online by your agent. Your agent will complete all transactions for you. This will include:

- setting up a new contribution or transfer
- changing the investments you are investing in
- setting up any financial adviser charges
- taking retirement benefits
- making any other changes.

When you open an Account you will also be given access to view your Account online. This will allow you to see:

- which investments you are invested in
- the value of those investments and how they are performing
- any charges applied
- any Account literature that we need you to read (placed in your Document Library).

Your agent can opt to provide you with additional access for managing your child's account.

Q How do I know where to invest?

A This is one of the most important decisions you will make. Your agent will help you to choose your investments. Whether a particular investment is suitable for you will depend on your circumstances, your investment goals and your attitude to risk. Help with investing can be found on our website or by speaking with your agent. We are an execution only service and we will never advise or instruct you on investing your money.

Each investment you invest in will have specific investment risks associated with it and your financial adviser will tell you what these are.

The range of investments we make available includes:

- Mutual Funds
- Exchange-Traded Instruments (ETIs) including securities

You can find out more about these types of investments from your agent or in our Client Terms and Conditions.

Q What are distribution, dividend and interest payments?

A Depending on the type of investments held, you may be eligible to receive a certain type of income payment from an investment. These payments are not guaranteed and can go down as well as up. The different types of payments are:

- distribution payments
- dividend payments
- interest payments.

More information on these payments is available from your financial adviser or in our Client Terms and Conditions.

Q How is investment income paid?

A All distribution, dividend or interest payments from your investments will be added to your Account as 'available cash'.

The money can then be used to pay charges on the Account. Income can be reinvested in certain types of investments to help your fund continue to grow. You can find out which type of funds will accept income reinvestment in our Client Terms and Conditions.

Q What about cash?

A Within each Account we offer a cash facility. We do this by providing access to a bank account operated by our banking partner. This bank account is not unique to your account. It holds money for all HUB Financial Solutions Investment Service investors centrally.

Q What is a disinvestment strategy?

A If we are due to take money from your Account to pay our charges or comply with any contractual obligations you have or to facilitate financial adviser charges and there is not enough available cash we may automatically disinvest from your investments. This action will raise cash so the charges and costs can be deducted.

Where investments in the Account are held in a model portfolio managed by a discretionary investment manager, and there is insufficient cash available to cover our charges, any financial adviser charges or the discretionary investment manager charges, investments within the model portfolio may be sold to raise cash to cover these.

You can find out more about disinvestment strategies in our Client Terms and Conditions.

Q Can I change my investments?

A Yes, you can ask your agent to make changes to your investments.

You may ask your agent to:

- buy and sell investments;
- redirect regular contributions to different investments.

If you have invested in a model portfolio, the discretionary investment manager may also instruct us to buy and sell investments when necessary to rebalance the model portfolio. This is done to make sure that the overall objective of the portfolio is maintained.

In some instances, there may be restrictions on the sale of investments, for example, if an investment is suspended from trading or where there are restrictions on when an investment can be sold.

Q What if I move abroad?

A It is important that you inform us immediately if it is your intention to move abroad, as you may no longer be eligible to contribute into your Personal Pension. You may also want to speak with your financial adviser as the move may affect other savings and investments you hold.

Taking your benefits

Q When can I take my benefits?

A You can start taking your retirement benefits at any time from the age of 55, even if you are still working. If you are in serious ill-health, or have an earlier protected retirement age, you may be able to take your benefits earlier than this.

Q What choices do I have to take my benefits?

A When you approach your selected retirement age, we will let you know what your options are at that time. You should also speak with your agent to determine the options that are best for you. Pension Wise, a free government service from MoneyHelper, can also give you impartial information around the choices you have: moneyhelper.org.uk/en/pensions-and-retirement/pension-wise

Currently the options for taking benefits include:

- converting your investments into retirement income by buying an annuity from an annuity provider
- drawing an income directly from investments in your Account (Drawdown Pension)
- taking a tax-free pension commencement lump sum and using the remainder of your Account to either buy an annuity or take drawdown pension
- taking the whole value of your investments as a cash lump sum.

Please note that different levels of taxation will apply to each option. You should speak with your financial adviser to find out more, to Pension Wise on 0800 011 3797, where they can explain more about the tax you might pay.

Any benefits you take from your Account will be paid in UK sterling into a UK registered bank or building society account.

Q What happens when I die?

A On notification of your death any regular payments or withdrawals will stop. Any financial adviser charges and discretionary investment manager charges will be stopped at that time.

The investments held in your HUB Financial Solutions Personal Pension will remain unchanged. However, will be subject to market movements until we receive the required documentation from your Personal Representatives allowing us to distribute any proceeds.

We will take into account any beneficiaries you nominate (you can do this using the Expression of Wish form) when we decide who to pay the benefits to and how much each person will receive.

Your beneficiaries can choose to receive the benefits via one of the following options:

- as a cash lump sum
- as a guaranteed yearly income, achieved by transferring the benefits and buying an annuity from an annuity provider
- as a flexible income, achieved by that they can increase or decrease by taking the benefits as a Drawdown Pension.

We will write to your beneficiaries setting out the options available to them. These benefits may be taxed, however this will depend on your circumstances at the time of your death. If you die before age 75 years, death benefits will normally be paid free of tax. If you die on or after your 75th birthday then the benefits will be subject to tax.

In some circumstances there may be a delay in passing the benefits on to your beneficiaries due to the type of investments held, for example, an investment may be suspended from trading.

CANCELLATION



Can I change my mind?

Yes you can. We will send you a Confirmation Schedule document which will include details of your right to cancel. You will have 30 days from when we issue your Confirmation Schedule in which to cancel. We will tell you if a different cancellation period applies to you.

If you start to take retirement income (also known as Drawdown Pension) from your Personal Pension, you will also have 30 days to change your mind.

Cancellation rights only apply to the first time you utilise Drawdown Pension on your Personal Pension.



What will I receive back if I cancel?

The amount we pay back will depend on what action has been taken in respect of your Account prior to the time you cancel.

If you exercise your right to cancel within 30 days from when we issue your Confirmation Schedule, we will refund any cash payment in full that we have received as part of a regular direct payment subject to the paragraphs below.

In all cancellation cases, any deductions to an Account will be restricted to the following:

- our own charges
- charges incurred in relation to your investment choices
- charges incurred for any transactions you make.

The amount we pay back will also reflect any market movement in the investments between the date the money was first applied to your Account and the cancellation date. This may be less or more than your original investment.

The amount returned on cancellation will also be less any financial adviser charges or discretionary investment manager portfolio charges that have already left your Account when we receive the cancellation request. The Embark platform cannot refund these to you.

If your financial adviser starts trading within the cancellation period, you may be liable for any charges due to us and any charges levied by third parties such as investment managers or stockbrokers.



How do I cancel?

For all cancellations, we will require you to call us on **01737 233468** to confirm your intention to cancel. On the call we will verify your identity and then issue you with a cancellation notice to sign and return.

OTHER INFORMATION

How to complain

If you are unhappy with the way you have been treated by us, you always have the right to complain. You can write to or phone us at the number and address below:

HUB Financial Solutions Ltd, Arena Building,
85 Ormeau Road, Belfast, BT7 1SH

Call: 01737 233468

If you are not satisfied with our response, you can then raise the issue with the Financial Ombudsman, using any of the contact methods below:

Financial Ombudsman Service, Exchange Tower,
London, E14 9SR

Call: 0800 023 4567

Email: complaint.info@financial-ombudsman.org.uk

Or visit: financial-ombudsman.org.uk

Referring the matter to the Ombudsman will not affect your right to take legal action later on.

If your complaint relates to the processing by us of your pension, you could raise the issue with the:

The Pension Ombudsman, 10 South Colonnade,
Canary Wharf, London, E14 4PU

Call: 0800 917 4487

Email: enquiries@pensions-ombudsman.org.uk

Or visit: pensions-ombudsman.org.uk

Terms and Conditions

This document provides information on the key features of the Personal Pension. It does not include all the definitions, exclusions and Terms and Conditions. You can find full details in our Client Terms and Conditions document. We will also provide you with an electronic copy in your Document Area if you decide to buy a Personal Pension.

We have the right to make changes to the Client Terms and Conditions. If this happens, we will let you know and explain the changes. Any changes will be added to your Document Area.

In the event of a conflict between the Client Terms and Conditions and this Key Features Document, the Client Terms and Conditions prevail.

Client categorisation

We categorise all of our clients as 'Retail Clients' under the FCA rules for all services and transactions. This helps us to make sure that you receive appropriate disclosure documents from us and that you are told everything you need to know in a timely fashion.

Communication

Our contract with you is in English and all future communication about it will be in English.

Financial Services Compensation Scheme (FSCS)

Embark Platform is authorised by the FCA so you will have access to the Financial Services Compensation Scheme (FSCS).

In the event you suffer financial loss because of our failure or an investment failure, the actual level of compensation you receive will depend on the basis of your claim and where the money you have with us is invested. The FSCS only pays compensation for financial loss. Compensation limits are per person per firm and per claim category.

The FSCS may be able to pay you compensation if we or any banks with whom we place your money are no longer able to meet our or their financial obligations. If certain investments fail, you may also be eligible for compensation.

- **Embark Platform:** In the unlikely event the Embark Platform fails, you may be eligible to make a claim for compensation as a consequence of losing investments you held in our Personal Pension for up to a maximum of £85,000. It is however unlikely you would need to make an FSCS claim for compensation in the event of an HUB Financial Solutions Investment Service failure because your Cash and Assets are held by appointed third party custodians on a segregated basis and in accordance with FCA Client Money Rules. This means your Cash and Assets are always protected from such an event.
- **Bank Failure:** In the event a Banking Partner is unable to meet its Financial obligations to you, you may be eligible to make a claim for any losses up to a maximum of £85,000.
- **Asset failure:** In the event of an Asset failure meaning the Asset may no longer be able to trade, you may be eligible to make a claim for any losses up to a maximum of £85,000 per Asset.

You can find out more details about the FSCS and how it covers your savings in our Client Terms and Conditions.

Law

You must be resident in the UK to open a new HUB Financial Solutions Personal Pension. The HUB Financial Solutions Personal Pension will be set up and governed by the law of England and Wales.

Where you have declared to us to being tax resident in any non-UK country, or where based on information you have provided to us, or where based on publicly available information, we have assessed you to be tax resident in any non-UK country we reserve the right to place restrictions on your account to limit further contributions, investment execution and any activity as we see fit.

HOW TO CONTACT US

HUB Financial Solutions Ltd, Arena Building, 85 Ormeau Road, Belfast, BT7 1SH

Call: **01737 233468***

Monday to Friday, 9am to 5pm

Email: **platformservices@hubfs.co.uk**

*Calls may be monitored or recorded and call charges may apply.

Please contact us if you would like this document in an alternative format.

HUB Financial Solutions, 3rd Floor, Arena Building, 85 Ormeau Road, Belfast BT7 1SH.

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