For advisers and
investment managers

Third Financial ISA

(Including Junior ISA)

Target market

June 2026
Thirdfin.com

Contents

Third Financial ISA (Including Junior ISA)

What is the Third Financial ISA?	1.1
What client needs and objectives does the Third Financial ISA and Junior ISA aim to meet?	1.2
What client characteristics is the Third Financial ISA designed to be compatible with?	1.3
Third Financial ISA advice	1.4
Third Financial ISA, Third Financial and our part in the distribution and value chain	1.5
How is the Third Financial ISA distributed?	1.6
Vulnerable clients	1.7
Reviewing clients against our target market	1.8
More information	2.0
Contact us	2.1

Third Financial ISA (Including Junior ISA)

This document provides important information on the target market of the Third Financial Individual Savings Account (ISA), and the Third Financial Junior Individual Savings Account (known together as the Third Financial ISA unless otherwise stated) and the client aims, objectives and needs it is designed to support. It is intended for use by advisers to help you understand whether the Third Financial ISA is right for your clients. It is based on Third Financial's opinion and does not take into account individual client circumstances.

1.1 What is the Third Financial ISA?

The Third Financial ISA is a flexible stocks and shares ISA, which allows the client to accumulate and benefit from a tax-efficient investment. The Third Financial ISA allows the clients' adviser or investment manager to invest in a range of investment options which are made available to them.

The Third Financial ISA has an investment allowance of £20,000 for the 2026-27 tax year less any amount invested into any other ISA with another provider during the same tax year. This limit is set by the government and could change in the future. The total subscription limit to both a stocks and shares ISA and a cash ISA in the same tax year cannot exceed £20,000. Third Financial does not offer a cash ISA.

The Third Financial Junior ISA is a stocks and shares ISA for children, which allows for the child to accumulate and benefit from a tax efficient investment over the medium to long term. The Junior ISA will be in the name of the child, who remains the beneficial owner. The Registered Contact, who must be the parent or legal guardian for the child, will be responsible for opening and administering the Junior ISA until the child becomes 18 or the child can, on request, take over as the Registered Contact from the age of 16.

The Third Financial Junior ISA has an investment allowance of £9,000 for the 2026-27 tax year. This limit is set by the government and could change in the future. Subscriptions paid into the Third Financial Junior ISA are a gift to the child and cannot be returned to the subscriber. As the subscriptions are a gift, these may be subject to inheritance tax depending on your personal circumstances, gifting record and available nil rate bands.

The aim of the Third Financial ISA is to:

- Enable the client to save in a tax-efficient way for themselves or on behalf of a child either through one-off or regular subscriptions (up to the annual ISA/Junior ISA limits), or to transfer one or more existing ISA, Junior ISA or Child Trust Fund ("CTF") arrangements.
- Allow the clients' adviser or investment manager to make investment decisions for themselves or on behalf of a child in accordance with HM Revenue and Customs (HMRC) regulations.

The Third Financial ISA has the following features:

- Online applications.
- Advisers can view and manage products online.
- Clients can view their products online.
- Adviser charge facilitation.
- A Junior ISA for minors.
- Ability to invest in a wide range of investments, such as platform funds and model Structured Products, as well as Exchange Traded Instruments (ETIs).
- Ability to make single or regular tax-free withdrawals at any time, with flexible access allowing them to replace any withdrawals within the tax year back up to the annual limit (not applicable to the Junior ISA).
- Direct Debit collection dates can be flexible in frequency and amounts, which can be increased (subject to the maximum subscription limit), reduced, started or stopped at any time.
- Bed and ISA can be used to establish or top-up an individual ISA product from existing holdings (subject to the subscription limit).
- No liability to capital gains or income tax on investment within the ISA or Junior ISA accounts.

For more information, see our Key Features Document.

1.2 What client needs and objectives does the Third Financial ISA and Junior ISA aim to meet?

The Third Financial ISA is designed to be compatible with the following client status, needs and objectives:

- Advised clients with a basic level of financial capability that would enable the client to provide informed consent to the advice provided, or clients with a discretionary investment manager who manages their investments on their behalf
- UK residents.
- Non-US persons (irrespective of country of residence).
- Have the ability to bear losses to capital without creating significant financial hardship.
- There are no minimum investment amounts, but the adviser or investment manager may have a minimum investment amount for their services.
- Individuals of any age – under 18's can be eligible for a Third Financial Junior ISA opened by their parent or legal guardian.
- To build savings in a tax efficient way or (for ISA only) to provide an income and easily accessible savings for themselves.
- To invest for the medium to long term (five years, ideally longer).
- Wish to make and vary ad hoc or regular subscriptions (within subscription limits).
- To consolidate different ISA's, Junior ISA's or CTF's with one provider to benefit from economies of scale and easier administration.

- Have the flexibility to withdraw and repay monies within the same tax year without affecting their subscription limits (not applicable to Junior ISA).
- Clients willing to accept more risk to their capital than saving in a cash ISA, or through a bank or building society.
- To utilise Additional Permitted Subscription (APS) allowances (not applicable to Junior ISA).
- Understand this ISA will be liable for Inheritance Tax unless invested in business relief assets with exemption requirements met.

The Third Financial ISA is NOT designed to be compatible with the following client needs, objectives or status:

- Non-UK residents (for Junior ISA this includes both child and Registered Contact).
- US persons (for Junior ISA this includes both child and Registered Contact - irrespective of country of residence).
- Non-advised clients wanting to invest in complex investments.
- To make subscriptions when not a UK resident to the Third Financial ISA.
- Clients subject to ongoing bankruptcy that has not been finalised and discharged.
- Clients aged 16 or 17 wishing to open a Junior ISA for themselves.
- To provide a guaranteed income for life.
- To invest only for the short term (less than 12 months) unless there is a specific client objective.
- To provide an investment for clients not willing to accept any risk to capital or the other risks as stated in the Key Features Document.
- To invest in cash for the long-term.
- To utilise investments which are not available on through Third Financial and do not meet the requirements of HMRC regulations.
- Have little or no other savings to cover emergencies.
- Inheritance Tax planning - the Third Financial ISA and Third Financial Junior ISA are not suitable to minimise any inheritance tax which may apply.
- To access capital or make any withdrawals from the Third Financial Junior ISA before the child is 18.
- Close the Third Financial Junior ISA account unless the child has a condition which means they are not expected to live more than six months.
- To require the return of subscriptions paid into the Third Financial Junior ISA; these cannot be returned to the subscriber.
- Junior ISA beneficial owners with an existing CTF. This would need to be transferred to the Third Financial Junior ISA at application stage.

1.3 What client characteristics is the Third Financial ISA designed to be compatible with?

In addition to the needs and objectives the Third Financial ISA is designed to meet, we can also define the client characteristics it's compatible with. As this can be subjective, we've broken down customer characteristics into three main categories to support assessing client suitability for the Third Financial ISA:

- **Target market** – This is the core group of clients that the product has been designed for.
- **Potential suitability** – This is a wider group of clients the product may still be suitable for but is not our core target market.
- **Not suitable for** – Clients exhibiting one or more of the characteristics stated here are unlikely to be suitable for this product.

Client characteristics	Target market	Potential suitability	Not suitable for
Age	ISA - Over 18 Junior ISA – Under 18	ISA - Over 18 Junior ISA – Under 18	ISA - Under 18 Junior ISA – Over 18
The Third Financial ISA is open to individuals of any age – under 18's may be eligible for a Third Financial Junior ISA opened by their parent or legal guardian. At age 16 the child can become the Registered Contact for the Junior ISA and at age 18 the Junior ISA will convert into an adult ISA.			
Investment knowledge and experience	Basic level of investment knowledge and experience with an appointed, Financial Conduct Authority (FCA) regulated financial adviser or investment manager.	Advised clients - Basic level of knowledge and investment experience with an FCA regulated financial adviser or investment manager	Non-advised clients without an appointed financial adviser or investment manager.
Clients must seek independent advice from a financial adviser or have a relationship with an investment manager who is regulated by the FCA and based in the UK Certain legislative restrictions may mean that not all of the assets available through the Third Financial are permitted for investment through the Third Financial Junior ISA or to non-advised clients.			
Fund size	There is no minimum eligibility for the product.		Clients who do not maintain the minimum fund size to maintain a relationship with their adviser or investment manager.
There is no minimum fund size set by Third Financial for the product, but the adviser or investment manager that the client appoints may maintain minimum fund sizes to continue to receive their service.			

Client characteristics	Target market	Potential suitability	Not suitable for
Length of investment	Long term – five years, ideally longer	Medium term (one to five years) if there is a specific client objective	To invest for the short term (less than 12 months) unless there is a specific client objective
We recommend that investments are made at least for the medium to long term – that is at least five years and ideally longer. Shorter timescales may be appropriate in certain circumstances but less than 12 months is unlikely to be. Withdrawals cannot be made from a Junior ISA until the child reaches age 18. Earlier access to a Junior ISA is only permissible if the child has a condition which means they are not expected to live more than 6 months.			
Attitude to/ capacity for risk	All except no appetite for risk	All except no appetite for risk	No appetite for risk and/ or investing for capital preservation only
The wide range of investments on offer mean that all attitudes and capacities for risk could be met except for zero risk or preservation of capital.			
Tax status	Clients must be a resident in the UK for tax purposes	Clients must be a resident in the UK for tax purposes	Clients who are not a resident in the UK for tax purposes/US persons
The Third Financial ISA is designed for UK residents. Non-UK resident customers and US persons (irrespective of country of residence) are not permitted. Members of the armed forces or a Crown servant (for example diplomatic or overseas Civil Service) or their spouse or civil partner if they reside overseas are permitted.			
Income / wealth	Ultra and high net worth, affluent	Mass affluent, with funds available for investment	No funds to invest
Our target market includes those clients likely to have sufficient income and savings to invest in their ISA.			
Country of residence	UK residents (exemption below)	UK residents (exemption below)	Non-UK residents/ US persons
The Third Financial ISA is designed for UK residents. Non-UK resident clients and US persons (irrespective of country of residence) are not permitted. This applies to both the child and Registered Contact. Members of the armed forces or a Crown servant (for example diplomatic or overseas Civil Service) or their spouse or civil partner if they reside overseas are permitted. The child can be eligible for a Third Financial Junior ISA if they are a dependent of a crown servant.			

We categorise clients as a 'retail client' as defined by the FCA. You may be able to request alternative categorisation, subject to our agreement. However, this may limit the level of regulatory protection and compensation available.

1.4 Third Financial ISA and advice

Clients must seek independent advice from a financial adviser or use an investment manager who is regulated by the FCA and based in the UK. Ideally, they will have an adviser to support them during the lifecycle of their product(s). There may be certain tools and functions that can only be used by clients with an adviser or investment manager. Clients may not be able to execute some actions if there is no adviser or investment manager linked to their product. We are not permitted to provide investment advice and cannot provide advice on the merits of using the service.

1.5 Third Financial ISA, Third Financial and our part in the distribution and value chain

As the manufacturer of the Third Financial ISA, we are responsible for ensuring that the product is approved, reviewed and withdrawn in accordance with our internal policies for product management.

We regularly review to ensure that the product continues to meet client needs (in addition to supporting vulnerable clients), that the target market and distribution strategy remains appropriate and the product avoids causing foreseeable harm. Where there are any identified harms or risks, we actively manage these to limit their impact to clients.

We're responsible for ensuring that the Third Financial ISA represents fair value to clients on an ongoing basis. We are not responsible for charge levels or the determination of fair value regarding charges for products or services not selected by Third Financial. For example, we are not responsible for charges relating to financial and investment advice.

1.6 How is the Third Financial ISA distributed?

The Third Financial ISA is distributed via FCA regulated financial advisers and investment managers that have clients within our target market.

1.7 Vulnerable clients

We have both a moral and regulatory duty to ensure that vulnerable clients are identified and treated fairly, according to their needs and experience outcomes as good as those for all other clients. We understand the importance of recognising and responding to vulnerability and the varied needs of vulnerable clients. To that end, we have a Group Vulnerable Customer Policy in place and staff have received and continue to receive ongoing training and support in recognising, dealing with and accommodating the needs of vulnerable clients.

The FCA has identified four key drivers which may increase vulnerability, these are:

- Health
- Life Event
- Financial Resilience
- Capability

To aid us in identifying and accommodating any additional support or tailored requirements that our clients may require it is helpful if advisers, investment managers or clients:

- Notify us at time of new business application of any adaptations required to support the client.
- Update us through the lifecycle of the plan of any new vulnerable characteristics identified or any that can be removed.

The Third Financial ISA is solely distributed through advisers and investment managers, and they will be the primary party supporting clients with their additional needs or tailored requirements.

1.8 Reviewing clients against our target market

It is the responsibility of each distributor to ensure that this target market is followed as they are best placed to consider clients' personal circumstances, needs, objectives, characteristics and suitability.

If we have concerns about plans distributed to clients that we believe are unsuitable, we will first contact the distributor to raise and discuss our concerns. We will not take further action until this discussion has taken place unless we feel there is significant potential for poor client outcomes by delaying action.

2.0 More information

For more information about the Third Financial ISA (including the Third Financial Junior ISA), please review the following documents;

- Third Financial ISA Key Features Document
- Third Financial ISA Terms and Conditions
- Third Financial Customer and Client Agreement
- Third Financial Terms for inclusion in Platform Terms and Conditions (operated by our Platform Partners)

2.1 Contact us

If you'd like to speak to us about this target market document, please contact your Third Financial relationship manager (if you are an adviser or investment manager). If you are a client, please contact us at 020 7135 2870.

The value of the Third Financial ISA may fall as well as rise. The tax treatment and tax benefits of a Third Financial ISA outlined in this document are based on our understanding of current tax law, and draft legislation that can change. Tax treatment depends on a client's individual circumstances and may change in the future. Product provider: Third Platform Services Limited, authorised and regulated by the FCA under Firm Reference Number: 717915.

020 7135 2870 hello@thirdfin.co.uk thirdfin.com

"Third Financial" is the trading name of Third Financial Software Ltd (TFS) (registered in England, number 06448163), Third Platform Services Ltd (TPS) (registered in England, number 09588254), Seguro Nominees Limited (SNL) (registered in England, number 10225403), TPS Offshore (Jersey) Ltd (TPSO) (registered in Jersey, number 131365). TFS, TPS and SNL have their registered office at 8th Floor, Centennium House, 100 Lower Thames Street, London EC3R 6DL. TPSO has its registered office at Whiteley Chambers, Don Street, St Helier, Jersey JE2 4TR. TPS is authorised and regulated by the Financial Conduct Authority. TPSO is registered with the Jersey Financial Services Commission. TFS and TPS are members of a VAT group with VAT registration number 514 0358 80. All companies are wholly owned subsidiaries of Nucleus Financial Platforms Limited (registered in England, number 06033126) whose registered office is at Suite B & C, First Floor, Milford House, 4355 Milford Street, Salisbury SP1 2BP, and are members of the Nucleus Group. Further details of the Nucleus Group can be found at nucleusfinancial.com. (12/25)