**Review of Existing Crystallised Pension**

**INSTRUCTION TO USER** – You can if you wish, undertake a review of a partly or fully crystallised pension directly via the wizard based PPOL Suitability Report Builder Software. A tick box within the plan information page will need to be ticked which will then open up a new wizard page that deals with any plan ‘crystallisations’.

Where not using the wizard tick box, the following section has been designed for a more detailed review of a pension plan already in drawdown (or has paid out a UFPLS) for inclusion within a report generated by the PPOL Suitability Report Builder. In the first instance, you will need to use the PPOL Suitability Report Builder to create a report including an Introduction section and any other required sections in the usual way. (*A ‘Retirement Income Recommendation’ section will be required if you are recommending further crystallisations or a switch of the existing plan to a new provider*). Once you have downloaded the report created via PPOL to Word, simply insert (via *copy and paste*) this section into your report after the Introduction section and before any new recommendation sections.

The text has been colour coded to aid with your understanding. Where the text is highlighted in blue this tends to suggest that the text may not be appropriate in all instances and you may need to delete some or all of it. Where the text is highlighted in red, this will require your input.

Please find below a review of your existing pension arrangement.

**<INSERT COMPANY> Drawdown Pension Plan - <POLICY NUMBER>**

|  |  |  |
| --- | --- | --- |
| **Fund Value** | **Transfer Value** | **Regular Contributions** |
| **£** | **£** | **£** |

This plan is invested as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Fund** | **Sector** | **Risk Rating** | **Fund Rating** | **Initial Charge** | **Annual Management Charge (AMC)** | **Ongoing Charges Figure (OCF)** | **Allocation** |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

The following currently applies to this plan.

|  |  |
| --- | --- |
| **Terminal Bonus** | **Market Value Adjustment** |
| **£** | £ |

*Existing Drawdown Plan Charges*

**<THE CHARGES TABLE BELOW IS THE STANDARDISED VERSION POST RDR USED IN OUR SOFTWARE>**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Entry | | | Ongoing | | | Event | Exit |
|  |  |  |  |  |  |  |  |

*Benefit* C*rystallisation Event*

This occurs when a member of a registered pension scheme converts part, or all of their accrued pension funds into income or lump sum benefits. The event triggers a test of the benefits crystallising at that point against the individual's available lifetime allowance (LTA). The LTA is an overall ceiling of the amount of tax privileged pension savings that an individual can draw and if breached, in certain circumstances a recovery tax charge will become payable. For greater detail on this, please refer to the pension technical notes within the appendix of this report.

**<FOR PRE APRIL 6TH 2015 CAPPED DRAWDOWN PLANS USE THE TEXT & TABLE BELOW>**

Your existing plan is in ‘Capped Drawdown’ and is subject to the following income limits:

|  |  |
| --- | --- |
| **Maximum Income** | **Minimum Income** |
|  |  |

*Crystallisations*

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Date** | **Amount** | **Tax Free Cash Paid** | **Current Income** | **Comparable Annuity** | **Critical Yield A at Age 75** | **Critical Yield B at Age 75** | **Next Income Review** |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

Your provider has confirmed your income could be sustained at its current level for **<INSERT>** years. Please see your personalised illustration for further details.

**<FOR PRE 6TH APRIL 2015 FLEXIBLE DRAWDOWN PLANS & POST APRIL 5TH 2015 DRAWDOWN PLANS USE THE MOST APPROPRIATE TEXT & TABLE BELOW>**

Your existing plan was previously set up as a ‘Flexible Drawdown’ contract, but this type of drawdown is no longer available with effect from 6th April 2015. Your plan has been automatically converted into a **‘Flexi Access Drawdown’** contract following the ‘Pension Flexibility’ reforms. The ‘no limit’ on withdrawals continues to apply to your pension fund but the previous secured pension income criteria has been removed along with the ban on future contributions.

Your existing pension plan fund value has been accessed flexibly by way of **‘Flexi Access Drawdown’ / ‘Uncrystallised** **Fund Pension Lump Sum’ (UFPLS)**. There are no income limits applying to this pension fund.

*Crystallisations*

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Date** | **Total Amount** | **Tax Free Amount** | **Taxable Amount** | **Comparable Annuity** | **Critical Yield A at Age 75** | **Critical Yield B at Age 75** |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

Your provider has confirmed your income could be sustained at its current level for **<INSERT>** years. Please see your personalised illustration for further details.

**<FOR ALL SHORT-TERM ANNUITIES USE THE TEXT & TABLE BELOW>**

Your existing pension plan fund value has been accessed flexibly by way of **‘Short Term Annuity’**.

*Crystallisations*

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Date** | **Total Amount** | **Tax Free Amount** | **Current Income** | **Term (Years)** | **Comparable Annuity** | **Critical Yield A at Age 75** | **Critical Yield B at Age 75** |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

**INSTRUCTION TO USER** - The critical yield figures should be extracted from the original illustration obtained when the policy was established or when the last crystallisation occurred or when the policy was last reviewed.

*Guarantees*

***<SELECT THE MOST APPROPRIATE TEXT>***

*There are no guarantees or safeguarded benefits attaching to your crystallised pension either for any income being paid or for the future capital value of your pension fund.*

*Your crystallised pension fund currently has a guarantee attaching to the amount of income being paid from it which will remain as long as no changes are made to your plan.*

*Your crystallised pension fund currently has a guarantee attaching to the future capital value of your fund which will remain as long as no changes are made to your plan prior to maturity.*

*Critical Yield*

The investment growth required to meet your current and / or future income requirements is set out later in this report and is known as the critical yield.

* *The Critical Yield A* - shows the rate of investment return required to break-even with a guaranteed annuity.
* The *Critical Yield B* - shows the average annual return required to ensure that you will have a sufficient pension fund to provide an income comparable to that which you are currently withdrawing when you come to purchase an annuity.

At the time of the last policy review / the policy was originally set-up, / of the last crystallisation the stated critical yields applied to your plan and I can confirm that this plan hasachieved / not achieved these figures to date.

**Future income requirements**

**<SELECT WHICH TEXT IS MOST APPROPRIATE TO YOUR RECOMMENDATION>**

You have confirmed that your existing income withdrawals are sufficient for your current and future needs and you want to maintain these.

You have confirmed that your existing income withdrawals are not sufficient to meet your current and future needs for the next twelve months and as such you would like to withdraw an increased income of £<INSERT> net per annum.

You have confirmed that your existing income withdrawals are more than you require to meet your current and future needs and as such you would like to reduce your income to £<INSERT> net per annum.

You have confirmed that your existing income withdrawals are capped and are not sufficient to meet your current and future income needs. You therefore wish to remove any limits that prevent you from taking income from your fund.

You have a firm understanding of your income requirements for the next <INSERT> years and wish to guarantee the level of annual income received during this timeframe.

You have confirmed that you require access to a lump sum and not a regular income to meet your living standards and expenditure needs. The lump sum amount required is £<INSERT>.

You wish to remove all investment risk from your pension fund and guarantee your future income through a lifetime annuity.

**Please be aware that taking a high level of income or regular lump sums will erode the capital value of the underlying fund and may result in your desired withdrawals not being sustainable throughout your retirement. This is particularly so if investment returns are poor. This is likely to result in a lower income should a lifetime annuity eventually be purchased.**

**Options**

To meet your future income requirements shown above, there number of options available to you in respect of your current arrangement. These can be summarised as follows:

**<SHOW THE OPTIONS IN YOUR SUITABILITY THAT CAN POTENTIONALY ACHIEVE THE CLIENTS FUTURE INCOME OBJECTIVES>**

1. Retain your existing plan with no further crystallisations
2. Continue within Capped Drawdown and crystallise new funds to your existing plan **<ONLY APPLIES TO PRE 6TH APRIL 2015 CAPPED DRAWDOWN PLANS>**
3. Take an Uncrystallised Fund Pension Lump sum (UFPLS)
4. Convert your Capped Drawdown plan to a Flexi-Access Drawdown plan with your current provider.
5. Convert your Capped Drawdown plan to a Flexi-Access Drawdown plan using a different provider
6. Continue with Flexi-Access Drawdown and designate new funds with your existing provider
7. Continue with Flexi-Access Drawdown and designate new funds using a different provider
8. Purchase a Short-Term Annuity from your crystallised fund value
9. Designate funds to a combination of options using Drawdown and UPFLS
10. Use your entire crystallised and uncrystallised fund to purchase a lifetime annuity

By way of a comparison, I can confirm that if you were to proceed with the purchase of a lifetime annuity in lieu of drawdown at this time <INSERT COMPANY> are offering the most competitive terms at present. The current transfer value could provide a fixed income of £<INSERT> per annum. This assumes the annuity is established as follows: <INSERT BASIS OF ANNUITY>.

**INSTRUCTION TO USER** - The critical yield figures highlighted below should be extracted from the new illustration provided by the holding company with whom the existing policy is held and be based on the clients stated income requirements.

Assuming the stated income requirement and an annuity purchase at the stated age, the following critical yields will apply to the recommended drawdown plan moving forward.

|  |  |
| --- | --- |
| **Critical Yield A at age {insert}** | **Critical Yield B at age {insert}** |
| % | % |

For a detailed comparison of the advantages and disadvantages of all retirement options, I refer you to the technical notes within the appendix of this report.

**INSTRUCTION TO USER** – Insert one of the following depending upon which option is being recommended.

**<INSERT TEXT BELOW IF YOU ARE RETAINING (without changing) THE EXISTING PLAN>**

Having considered your current position and future income objectives, I have recommended that your existing plan is **retained** **unchanged** for the following reasons:

* Your drawdown plan in its current form continues to reflect your objectives and income requirements
* Your drawdown plan in its current form continues to reflect your stated risk profile
* <Capped Drawdown only> You will retain the ability to make future tax relievable ‘money purchase based’ pension contributions up to the current standard annual allowance currently £60,000 per annum
* <Capped Drawdown only> Any transfer away from your current plan and provider would not trigger the lower Money Purchase Annual Allowance (MPAA) which limits your future money purchase tax relievable contributions to £10,000 p.a.
* <Capped Drawdown only> The current income limits for capped drawdown are retained allowing for a more disciplined approach to meeting your retirement income requirements
* <UFPLS only> Your plan rules continue to allow you to make ad-hoc withdrawals without the need to designate further funds into drawdown.
* <UFPLS only> Knowing that you can take withdrawals of any size at any time under the scheme rules of your current plan means ongoing charges associated with drawdown can be minimized
* <Flexi- Access only> The income you require is available without restriction on amount or frequency and there is no reason to incur potential additional costs obtaining this income elsewhere
* I am satisfied with the investment performance of this plan
* A penalty would be incurred on a switch away from your current plan
* The charging structure of this contract remains competitive when compared to similar such products available in the marketplace
* The holding company remains financially strong.
* You have no desire to make use of full fund withdrawal as you do not wish to remove funds from the original pension wrapper
* You intend to withdraw future lump sums to match your desired expenditure
* <INSERT ADDITIONAL REASONS HERE>

**<INSERT TEXT BELOW IF YOU ARE RETAINING (with changes) THE CURRENT PLAN>**

Having considered your current position and future income objectives, I have recommended that your existing plan is **retained** but **amended** for the following reasons:

* You wish to designate further funds for withdrawal to meet your latest income requirements and your drawdown plan in its current form is flexible enough to accommodate these requirements in a variety of ways
* <Capped Drawdown only> Drawdown continues to reflect your needs and objectives, but you require a greater level of income compared to the maximum capped income available under the current plan
* <Capped Drawdown only> Your current income requirements remain below the current cap
* <Capped Drawdown only> Your current income requirements have increased above the current cap
* <Capped Drawdown only> The increase in income above the existing cap will mean an automatic change in drawdown rules from capped drawdown to Flexi-Access Drawdown
* <Capped Drawdown only> You will retain the ability to make future tax relievable ‘money purchase based’ pension contributions up to the current standard annual allowance currently £60,000 per annum
* <Capped Drawdown only> You will no longer retain the ability to make future tax relievable ‘money purchase based’ pension contributions up to the current standard annual allowance currently £60,000 per annum if your income level exceeds the current cap
* <Capped Drawdown only> Any transfer away from your current plan and provider would not trigger the lower Money Purchase Annual Allowance (MPAA) which limits your future money purchase tax relievable contributions to £10,000 p.a.
* <Capped Drawdown only> The current income limits for capped drawdown are retained allowing for a more disciplined approach to meeting your retirement income requirements
* <UFPLS only> Your current income requirements can be met through an ad-hoc withdrawal direct from your pension fund without the need to crystallise further funds or designate new amounts from your drawdown account
* <UFPLS only> Knowing that you can take withdrawals of any size at any time under the scheme rules of your current plan means ongoing charges associated with drawdown can be minimized
* <Flexi- Access only> The income you require is available without restriction on amount or frequency and there is no reason to incur potential additional costs obtaining this income elsewhere.
* Charges for amending your income requirements will be minimized using this plan
* I am satisfied with the investment performance of this plan
* A penalty would be incurred on a switch away from your current plan
* The charging structure of this contract remains competitive when compared to similar such products available in the marketplace
* The holding company remains financially strong.

**<INSERT TEXT BELOW IF YOU ARE TRANSFERING TO A DIFFERENT PROVIDER>**

Having considered your current position and future income objectives, I have recommended that you **transfer** your existing benefits to an alternative plan for the following reasons:

* <Capped Drawdown only> A reduction in the annual allowance for tax relievable contributions is not a concern for you
* Drawdown continues to reflect your needs and objectives, but you require greater flexibility over your pension fund withdrawals
* Drawdown in its current form continues to reflect your stated risk profile, but your investment options are limited within your current plan
* Your existing plan cannot accept the transfer in of additional pension benefits
* Your existing plan will not allow Uncrystallised Fund Pension Lump Sums (UFPLS) as a retirement option
* Your existing provider has expressed uncertainty in continuing within this marketplace
* There would be no financial penalty incurred on transfer
* It is possible to transfer your fund to an alternative plan with a more competitive charging structure. A summary of the charges of your existing plan and the proposed alternative can be found later in this report
* So your funds can be held via a wrap or platform which provides greater flexibility and control in terms of the assignment and management of your pension assets
* The current reversionary bonus rate applying your plans With Profit Fund is only <INSERT>% per annum
* Recent annual bonus rates applied to your plans With Profit fund have been poor
* The bonus rates declared by a life company are not an explicit reflection of the performance of the underlying assets held within their With Profit fund. In contrast a unit linked investment offers full transparency and its value is a true reflection of the underlying assets
* The Free Asset Ratio of this With Profit fund is <INSERT>%. This is low when compared to others in the marketplace. The Free Asset Ratio is a measure of the company's With Profit fund’s assets over its liabilities and can be considered a useful indication of the likely returns you will receive in the future
* Although market value adjustments may be reduced or removed in time, it is impossible to provide any indication as to when they will no longer be applied in their entirety
* A transfer will crystallise the terminal bonus applying to the With Profit fund
* The range of alternative funds is quite limited under this contract, as such I have disregarded the option of an internal fund switch
* So your pension assets can be reinvested in a manner more befitting of your risk profile
* Your existing providers investment fund choices are more appropriate for an accumulation strategy instead of a de-cumulating retirement income strategy via drawdown. You have expressed dissatisfaction with the performance of this pension to date
* It was agreed that we would invest your pension fund with a discretionary fund manager, which is not available via your current plan
* To consolidate your pension funds with your other investments which will be administered by one provider thereby offering providing certainty of affairs and ease of administration and economies of scale
* The existing plan offers limited online functionality
* You have been extremely disappointed by the service you have received from the holding company
* There have been several questions raised concerning the financial strength of the holding company in recent times
* The holding company has closed their books to new business. With no new monies coming in this raises questions concerning their future growth prospects and long term viability
* <INSERT ADDITIONAL REASONS HERE>

My specific recommendation for an alternative plan can be found in the ‘Retirement Income Recommendation’ section that follows.

**INSTRUCTION TO USER** – If you are recommending a transfer, The PPOL solution should be used to create a recommendation section for the proposed new plan in the usual way via ‘Retirement Income Recommendation’ section. If the plan to be transferred is already fully crystallised, please ensure you state so at outset so no reference to the payment of any more tax free cash is included within the final report.

**<INSERT TEXT BELOW IF YOU WISH TO RECOMMEND A SHORT-TERM ANNUITY>**

Having considered your current position and future income objectives, I have recommended that you cease drawdown and **purchase a short-term annuity** for the following reasons:

* Your personal circumstances have changed and recent income withdrawals are no longer appropriate
* So your pension assets can benefit from guarantees which is more befitting of your risk profile
* You have greater certainty over your income requirements in the short term as opposed to the longer term and wish to guarantee the income received over the next {INSERT} years
* You now wish to fix your income over the next {INSERT} years at {£ INSERT} per annum
* Your state pension entitlement will be paid to you in {INSERT} years which will require a review of the amount of income being withdrawn.
* You want certainty over the future maturity value of your pension funds and the option to guarantee this has not been possible with your existing provider.
* Your already crystallised funds are sufficient to guarantee your short-term income needs
* You do not want to crystallise any new pension funds and wish instead to designate sufficient funds held in your drawdown account to guarantee your stated income requirements
* <INSERT ADDITIONAL REASONS HERE>

**<INSERT TEXT BELOW IF YOU INTEND TO BUY A LIFETIME ANNUITY OR SCHEME PENSION>**

Having considered your current position and future income objectives, I have recommended that you cease drawdown and **purchase an annuity** for the following reasons:

* Drawdown in its current form no longer reflect yours needs and objectives
* Drawdown in its current form no longer reflects your attitude to risk
* There is no investment risk associated with the purchase of a guaranteed annuity, thereby reflecting your stated risk profile moving forward
* It will provide a guaranteed regular income stream throughout your lifetime (and where elected for your spouse or dependents) as per your requirements
* Your future income stream is known and guaranteed unlike your current drawdown plan
* You lack discipline in managing your retirement income strategy and prefer a known and fixed income stream
* Your scheme assets strongly outweigh your scheme liabilities, and a favorable pension income can be secured for members
* <INSERT ADDITIONAL REASONS HERE>

My specific recommendation for a lifetime annuity can be found in the ‘Retirement Income Recommendation’ section that follows.

**INSTRUCTION TO USER** – If you are recommending an annuity purchase, the PPOL solution should be used to create a section for the proposed new plan in the usual way via the ‘Retirement Income Recommendation’ section. Where no tax free cash entitlement remains, please ensure you elect the option that benefits have already been crystallised so no reference to the payment of further tax free cash is included within the final report.

**INSTRUCTION TO USER** – The following should be included should you wish to recommend a switch of the underlying funds held within the existing drawdown pension arrangement.

I have also recommended that you undertake the following **internal fund switch** for the reasons detailed below:

|  |  |  |  |
| --- | --- | --- | --- |
| **Fund to be transferred** | **%** | **Fund to transfer into** | **%** |
|  |  |  |  |
|  |  |  |  |

* As part of our reviewing procedures, our recommendation to switch funds will ensure the balance of your portfolio reflects your primary objectives
* The performance of the proposed funds can be confirmed as superior
* The overall portfolio cost has slightly increased but we believe the opportunity for consistent returns will off-set the additional cost
* I can confirm the overall cost of your portfolio has reduced
* Your plan will not incur any tax charge
* The recommended switch will be actioned free of charge
* The recommended funds have been more consistent in terms of providing above average sector performance
* The recommended funds have been awarded a Fund Rating by <INSERT>
* It will reduce the volatility (risk) as per your objective
* I believe the recommended investment strategy offers greater potential to achieve the required Critical Yield
* The recommended investment strategy will align your portfolio more closely to your stated attitude to investment risk
* The consensus market outlook for the recommended sector and asset classes is positive
* Having discussed your dissatisfaction with the performance of this pension to date, it was agreed that we would invest your pension fund with a discretionary fund manager
* <INSERT ADDITIONAL REASONS HERE>

Your underlying investment fund(s) will be restructured as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Fund** | **Description**  **/ Objective** | **Sector** | **Fund Rating** | **Initial Charge** | **Annual Management Charge (AMC)** | **Ongoing Charges Figure (OCF)** | **Allocation** |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

*Performance Comparison*

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **5 years** | **3 years** | **1 year** | **6 months** | **1 month** |
| **Existing:** |  |  |  |  |  |
| **Proposed:** |  |  |  |  |  |
| **Difference:** |  |  |  |  |  |
| **Benchmark:** |  |  |  |  |  |

Data source: <INSERT> Date: <INSERT>

*Charges Comparison*

|  |  |  |
| --- | --- | --- |
|  | **Existing** | **Proposed** |
| **Entry Charges** |  |  |
| Adviser Charge |  |  |
| AC Paid By |  |  |
| Provider Charge |  |  |
| Fund Charge |  |  |
| **Ongoing Charges** |  |  |
| Adviser Charge |  |  |
| AC Paid By |  |  |
| Investment Management Fee |  |  |
| Additional Fees |  |  |
| DFM Charge |  |  |
| Wrap / Platform Charge |  |  |
| **Exit Charges** |  |  |
| Exit Charge |  |  |
| **Effect of Charges** |  |  |
| Reduction In Yield |  |  |

**<INCLUDE RISK WARNINGS ON NEXT PAGE IF A FUND SWITCH HAS BEEN RECOMMENDED>**

**<ENSURE THE CORRECT NOTES ON FINANCIAL PRODUCTS ARE SHOWN IN YOUR SUITABILITY IF NO RECOMMENDATION (EG. RETAIN) IS MADE>**

**Risk Warnings**

**General**

* The recommendations are based on current taxation, law and practice all of which may be subject to change.
* Any quotations provided are for illustration purposes only and are not guaranteed.
* For a full explanation of the charges and how they affect the plan, please refer to the personalised illustration and Key Features document(s).

**Investments**

* Past performance is no guarantee of future returns.
* Inflation will reduce the real value of the capital invested if returns do not match or exceed the rate of inflation.
* An investment should be considered over a medium to long-term time frame and should not be entered into if the capital is required for other needs.
* The value of the investment is determined by units or shares, the price of which can fall as well as rise. The value could be less than what was originally invested, especially in the early years.
* Please bear in mind that the outlook for asset classes and market sectors can change and as a result the asset allocation could become unbalanced.
* Investing in a single or limited range of asset classes or sectors may lead to greater volatility and therefore carry a greater investment risk.
* A certain fund or funds may have a higher risk rating than the agreed attitude to risk, but the overall risk applied of the combined funds or portfolio is designed to meet the agreed risk profile.
* Equities can significantly fall in value and in difficult times dividends may reduce or stop.
* Where an investment is exposed to property there can be times when this is difficult to sell, meaning the investment may not be able to be cashed-in when required.
* Corporate bonds are not risk free as the bond issuer could default, interest rate rises could reduce the capital values and in adverse market conditions the fund could become illiquid making it difficult to sell.
* Where a fund invests in overseas markets, domestic upheaval and changes in currency exchange rates mean that the value of the investment can go up or down.
* It is important to periodically review the value of an investment against expectations and the underlying investment strategy, particularly when close to retirement.
* The higher the charges applied to an investment the greater the effect of those charges on the performance.
* Changing funds or transferring excessively, may erode the value due to transactional based fees.
* Any sale of investments held, including switching may give rise to a capital gains tax liability and any income generated will normally be subject to income tax.

**Fund Switching**

* Provider restrictions may apply on which funds can be switched into especially if they are not the same type of fund (e.g. capital or income units which attract different charges or other fund limitations).
* The funds could materially suffer from market movements when transferring from a fund to another due to a period where the funds are not invested.
* A switch does not guarantee that the new fund will outperform an existing fund.
* Where switching occurs outside of a tax exempted investment, the sale of units or shares will create a Capital Gains Tax (CGT) liability and any gains exceeding the annual allowance will be taxable.