



Online Services and Outsourced Administration Service Standards Overview Report 6 months ending June 2025

Introduction

The purpose of this document is to provide current and potential users of the James Brearley Online and Outsourced Administration Services with confirmation of how successful it has been in meeting its service level aspirations be these of a contractual or general nature.

All staff are on a hybrid structure, working 5 days in the office and 5 at home over each two-week period. During the 6-month reporting period we have continued to operate effectively, and in line with our usual service standards.

Contractual:-

Online Services Support Desk- operators have been in position to field client enquiries and execute trades, from 8am to 5pm on each business day over the period. The team at the reporting point consisted of 12 operators under the management of Paul Swallow. During the period Harley Wilson and Cameron Gibbs-Taylor commenced employment however, Alexandra Cleary left the firm. The team has over 95 years' experience.

Outsourced Administration Team- administrators were available to process documentation and handle queries between 8.45am to 5:00pm on each business day over the period. The department consists of 5 administrative staff under the management of Paul Swallow. The team has over 40 years' experience.

Account Opening- we commit to open an account by no later than the second business day for Online Services clients and no later than two business days for Outsourced Administration clients following the receipt of the appropriate account opening instruction and supporting documentation. The account number along with unique access details to the online valuation service are provided to the intermediary or underlying client where appropriate. Over the period we opened a total of 1,332 accounts equating to a monthly average of 222 accounts, ranging from 148-314. All were opened within service level targets. During the period from Friday 28th March to Thursday 15th May, the firm was unable to accept new account opening requests for Online Services clients, as a consequence of entering into a Voluntary Restrictions (VREQ). This arose from the FCA's concerns with the adequacy of the firm's Financial Crime related systems and controls, which led to the firm being subject to a Skilled Persons Review. Given that the firm implemented each of the Recommendations satisfactorily, being independently assessed by the Skilled Person, the FCA were happy to lift the VREQ, which proved very short lived.



Account Closures- we commit to closing an account by no later than the third business day following the receipt of the appropriate account closing instruction and supporting documentation. Over the period we have closed 291 accounts equating to a monthly average of 48 accounts, ranging from 31-81, all within service level expectations. Outside of the above we closed 884 where accounts had been dormant for 3 years, these holding no assets and no transactions.

Cash Transfers- we commit to crediting all receipts of electronic payments to the client's account when a supporting account number is provided by the first business day following receipt by our bankers. Over the period we received 4,633 payments equating to a monthly average of 772. The objective of crediting the payment on the first business day following receipt where the account number was started and there was no name difference, was satisfied in every instance. There were 1,535 instances, the majority Outsourced Administration Services accounts where the account number was not known at the outset due to the account not yet being set up or no details being provided on the bank statement which were acceptable to allocate directly to the clients account, however, the payments were all applied within 10 days being the regulatory requirement. There was however, two errors made in October 2024 when applying payments as part of a bulk migration. The two issues were identified in February 2025 as a result of account numbers being transposed. An apology and gesture of goodwill payments were made for the error.

Payment Requests – we commit to making payment to clients within 24 hours of receiving the request. Over the period we sent 1,389 payments equating to a monthly average of 231, ranging from 148-384. In all instances but one we satisfied this service. The instances we failed was a result of confusion regarding the bank details of a SSAS client which was delayed to day 4.

Corporate Actions- our objective is to issue a notification of a corporate action requiring a client instruction within 7 business days of our stated deadline to receive such responses. From time to time this is not possible due to the details of the corporate action being received within this period from the company. Over the reporting period we processed a total of 537 corporate actions, of which 3 notifications were issued in 7 or less business days from our stated deadline. In 1 instance we gave 7 days, in 1 instance we gave 6 days and in 1 instance we gave 2 days. In all instances the delay in not being able to notify clients was out of our control such as the notification was received via the post rather than electronically.

Maturing structured product investments- our objective is to process the capital outcome of any maturing investment within 5 business days of receiving the relevant funds. Over the period 69 maturity payments were all processed within 3 days of their receipt, as such satisfying this objective.

Payments- our objective is to allocate all dividend and interest entitlements to clients within a maximum of 5 business days of their receipt. Over the period we processed a total of 3,072 income entitlements of which 1,942 (95.77%) were credited to clients' accounts within 2 business days of their receipt, 128 (4.16%) within 2-5 days, 2 (0.06%)



between 6 and 10 days. No entitlements were processed later than 10 days of their receipt, being the regulatory requirement.

Dealing Orders- the timely and best execution of transactions is monitored, and a member of staff is responsible for reviewing each day's transactions against the firm's Order Execution Policy. From a timely execution point of view, we commit to execute all listed-security transactions within one hour of the order being received. In the case of funds, we commit to placing the instruction with the fund group within two hours of receipt. Over the period, we executed a total of 148,917 transactions (this compared to 139,922 for the 6-month period ending Dec 2024), of which no trades were identified as being untimely in nature. A total of 2,668 (1.79%) listed security trades were subject to a pricing review; in that they were identified as an outlier by our overnight "Best Execution" monitoring. On all but 2 occasions, we were satisfied that the trades were executed at an appropriate price. Where they did not meet our expectations, we approached the relevant market maker who on each occasion agreed to amend their price accordingly. We also commit to issue a confirmation notice of the transaction by the end of the next business day. Over the period there was one instances where confirmation notices for 15 clients were issued outside of this parameter, this due to a system error in the booking of a trade and our inability to identify such issues. The route cause has been identified and procedures put in place to ensure there is no repetition. Confirmation notices were not sent on day 4.

Complaints Handling- we have defined structures for handling all complaints received across the business in a professional, open, and independent manner. There were 15 complaints over the period for the two departments of which one was upheld. 10 complaints related to a stock transferred into us on behalf of direct Execution-only clients from the former Reyker Securities who went into receivership. In each instance clients wanted to understand where their stock was and wanted their money back. The remaining 5 complaints, related to our level of administration and our system not operating as we would expect. In 3 instances our service and that of how our system operated were deemed to be acceptable. In the other 2 instances our service was not deemed acceptable this where we contributed with a pension provider to delay the liquidation of stock and forward the cash. As such a gesture of goodwill payment was made of £250. In the second instance we updated the clients fee rate without prior notification. All fees and dividend charges over a 7-month period were refunded with an apology regarding the oversight.

Advisor Fees- following receipt of client monies and the processing of an application form, advisor fees were all automatically remitted to each firm, within 24 hours.

General:-

Web portal uptime- a critical element in the successful delivery of our online services is providing clients with continued access to our online valuation and where appropriate dealing facilities. The Service Level Agreement with our website host and system provider, FNZ, reflects a minimum target uptime of 99.95% excluding scheduled maintenance time. Over the reporting period the website functionality operated 99.99%



of the time, as such meeting this target. The system was unavailable for 29 minutes in February 25, where there were connection issues to the mainframe.

Prompt Settlement- we strive to achieve the settlement of all transactions by no later than the indicative settlement date. Although this can be quite a challenge with fund groups, given the different settlement methods used by their respective administration teams, in contrast the settlement of most listed security transactions via the Crest system is far more consistent. There were no known Crest Settlement issues over the period where we executed the trade directly with the market.

Quarterly Nominee & Valuation Report- we aim to provide clients with their reports no later than the 15th of the month following each quarter ending March, June, September and December. The nominee and valuation reports were all distributed before the 15th of the month following quarter end, meeting this service standard.

Capital Gain Reports and Tax Reports - we aim to provide clients with their reports no later than the end of June each year. These were delivered in May meeting this service standard.

Cost & Charges Statements- we aim to provide clients with their statement no later than the end of June each year. These were delivered in May 2025.

Timely handling of enquiries- we aim to provide a response to each email enquiry from our clients within one business day of its receipt. Over the last six months we received 35,083 emails equating to a monthly average of 5,847 emails, having a monthly range of 5,178 to 6,292. In every instance where Online Services and Outsourced Administration have a relationship with a firm, we satisfied this internal target.

Application of fees – monitoring of our fees applied during the reporting period identified one account that had been applied fees where the applicable Rate Card had not been provided. All fees were reversed so no charge was applied at all.

Client data is kept securely – we have a responsibility to keep client data secure. During the reporting period there were no instances where data was accessed or shared inappropriately.

July 2025.