



Online Services and Outsourced Administration Service Standards Overview Report 6 months ending June 2023

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 10 operators under the management of Paul Swallow, with total experience in their roles of over 88 years.

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. Rebecca Riding left the team and at the reporting point, the department consisted of 5 administrative staff under the management of Paul Swallow. The team has over 37 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 seven 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 at this time. Over the period we opened a total of 5,771 accounts equating to a monthly average of 961 accounts, ranging from 757-1539. All but one account was opened within service level targets, this a result of it not being appropriately prioritised by an operative.

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 226 accounts equating to a monthly average of 38 accounts, ranging from 12-111, in each instance satisfying this service objective.



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 7,151 payments equating to a monthly average of 1,190. The objective of crediting the payment on the first business day following receipt where the account number and name was known was satisfied in every instance. There were 3,160 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 reference being quoted in the bank transfer, however, the payments were applied within 10 days being our regulatory objective before returning the monies. There were three instances where the payment was applied to an incorrect account due to a manual error which were subsequently rectified on coming to light and were recorded as a CASS rule breach.

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 645 corporate actions, of which 17 notifications were issued less than 7 business days from our stated deadline. In 2 instances we gave 7 days, in 6 instances we gave 6 days, in 1 instance we gave 5 days, in 1 instance we gave 3 days and in 2 instances 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. In every instance where the client was not given at least 7 days notification of the corporate action, we ensured the client was not disadvantaged.

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 44 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 3,255 income entitlements of which 3,144 (96.59%) were credited to clients' accounts within 2 business days of their receipt, 110 (3.37%) within 2-5 days, 1 (0.04%) between 6 and 10 days. As such all entitlements were posted within the 10 day 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 173,802 transactions (this compared to 169,889 for the 6-month period ending December 2022), of which 1 trade was identified as being untimely in nature. As the client had been disadvantaged, the client was put back in the position they would have been in had we executed the trade in a timely manner. A



total of 1,187 (0.683%) listed security trades were subject to a pricing review, in that they were identified as an outlier by our overnight “Best Execution” monitoring. Other than on one occasion, we were satisfied that the trade was executed at an appropriate price due to mitigating circumstances. On challenging the market makers in respect of these, they agreed to amend the expected price we believe should have been received. We also commit to issue a confirmation notice of the transaction within 24 hours of receipt. Over the period there were no instances where the confirmation notice was issued outside of this parameter.

Complaints Handling- we have defined structures for handling all complaints received across the business in a professional, open, and independent manner. There were 6 complaints over the period for the two departments of which 4 were upheld. Each of the 4 related to our level of administration service falling below what was expected. There were no material impacts with a decision to:- refund a charge, extend a small goodwill payment and we went back with a couple of apologies.

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 99.96% of the time, as such meeting this target.

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.

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. In the last two quarters the reports were distributed before the 15th of the following month, meeting this service standard.

CG 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 and early June meeting this service standard.



James Brearley

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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 39,679 emails equating to a monthly average of 6,612 emails, having a monthly range of 5,015 to 7,996. In every instance we satisfied this internal target. Over the reporting period, we received 7,785 calls equating to a monthly average of 1,296 calls, having a monthly range of 1,038 to 1,410.