



Online Services and Outsourced Administration Service Standards Overview Report 6 months ending December 2024

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 11 operators under the management of Paul Swallow, with total experience in their roles of over 95 years. During the period Ian Rutter sadly passed away and Alexandra Cleary commenced employment.

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 rather than 5 under the management of Paul Swallow with Kerry Downie accepting a role within our Reconciliations team. 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 2,163 accounts equating to a monthly average of 360 accounts, ranging from 275-434. All were opened within service level targets.

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 459 accounts equating to a monthly average of 76 accounts, ranging from 41-74, all within service level expectations.



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 4,792 payments equating to a monthly average of 799. 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 2,013 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.

Payment Requests – we commit to making payment to clients within 24 hours of receiving the request. Over the period we sent 1,955 payments equating to a monthly average of 325, ranging from 122-389. In all instances but two we satisfied this service. The instances we failed were as a result of a member of the team not taking the necessary action to process a CHAPS payment in a timely manner believing it to be a BACS payment and the second instance, where we paid an intermediary instead of the bank account linked to the client.

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 552 corporate actions, of which 10 notifications were issued less than 7 business days from our stated deadline. In 5 instances we gave 7 days, in 4 instances we gave 6 days and in 1 instance we gave 4 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 104 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 3,333 income entitlements of which 3,220 (96.61%) were credited to clients' accounts within 2 business days of their receipt, 111 (3.33%) within 2-5 days, 1 (0.03%) between 6 and 10 days, and 1 (0.03%) dividend over 10 days. 10 days being the regulatory requirement. The one dividend paid after more than 10 days was Euro money paid to our global custodian SIX however, it did not appear on a dividend or corporate action report so was unknown. The money was subsequently converted and applied to client's accounts on day 22.



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 139,922 transactions (this compared to 150,812 for the 6-month period ending June 2024), of which 1 trade was identified as being untimely in nature and the client was put in the position, they should have been in had we executed the trade timely. A total of 1,893 (1.35%) 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 3 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 were two instances where the confirmation notice was issued outside of this parameter, this due to a member of staff not actioning an order upload in line with procedures

Complaints Handling- we have defined structures for handling all complaints received across the business in a professional, open, and independent manner. There were 7 complaints over the period for the two departments of which one was upheld. 4 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 3 complaints related to our level of administration falling below what was expected. In two instances our service was deemed to be acceptable; however, there was an instance where we failed to follow procedures in respect of an internal SIPP transfer and as such a gesture of goodwill payment was made of £200 for the inconvenience caused to the client.

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 99.93% of the time, as such not meeting this target. The system was unavailable for just over 6 hours in October 2024, this outside market hours, 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.

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 32,700 emails equating to a monthly average of 5,450 emails, having a monthly range of 4,056 to 6,734. 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 68 accounts incorrectly charged. The issues related to not charging an Advisor fee as instructed at the outset of the relationship with the intermediary, cash incorrectly not being included in the calculation of the Advisor fee, an incorrect stock price inflating the fee applied to the client which was not corrected and a client charged twice having changed their service to that of Execution Only. In each instance a gesture of goodwill payment was made to the client for our error and loss of any interest. There was also an instance of overcharging an intermediary when off setting JB fees. A full review of all fees and structures was undertaken to ensure no repetition.

Client data is kept securely – we have a responsibility to keep client data secure. During the reporting period there was one instance where an error occurred resulting in data being sent to the wrong party. The breach was reported to our Data Security Lead and a full review undertaken. In light of the limited amount of shared personal data and containment, our Data Security Lead did not report it to the Data Protection Commission. There was no need for the client's personal data to have been included in the report, something that was overlooked on this occasion.

January 2025,