

**WealthTek Limited Liability Partnership  
In Investment Bank Special Administration**  
(trading as WealthTek, Vertem Asset Management and Malloch Melville)

In the High Court of Justice No. CR-2023-001772

Joint Special Administrators' progress report  
from 6 October 2025 to 5 April 2026

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# GLOSSARY OF TERMS

Abbreviation or term	Meaning
'Act'	Insolvency Act 1986
'Authorities'	The Bank of England, the Treasury and the FCA, collectively
'Barclays'	Barclays Bank UK Plc
'Barclays Voluntary Payment'	A payment of £6,281,757 received by the JSAs pursuant to a settlement between Barclays and the FCA
'Bar Date'	A deadline for Clients to submit their claims in respect of Client Money and/or Custody Assets, which was set as 20 March 2024
'CASS'	The FCA's Client Assets Sourcebook
'CASS 7'	Chapter 7 (client money rules) of CASS
'CASS 7A'	Chapter 7A (client money distribution and transfer) of CASS
'Client'	A party for whom the LLP held Client Money and/or Custody Assets (i.e. Client Assets)
'Client Assets'	Client Money and Custody Assets, collectively
'Client Assets Claim'	Each Client's claim to the Custody Assets
'Client Assets Claim Form'	The form submitted by Clients agreeing or disagreeing with their Client Assets Claim and/or Client Money Entitlement, as set out in their Client Assets Statement
'Client Assets Confirmation Statement'	The statement sent to Clients by the JSAs setting out their agreed claim in respect of both Custody Assets and Client Money following the approval of the Distribution Plan
'Client Assets Reconciliation'	A reconciliation conducted by the JSAs to confirm (a) the Client Assets held by the LLP on behalf of its Clients and (b) the claims of Clients in respect of those Client Assets
'Client Assets Return Method Form'	The form submitted by Clients to indicate whether they wish to transfer their Client Assets to an alternative broker, or liquidate their Custody Assets
'Client Assets Statement'	The statement that each Client was sent by the JSAs (in advance of the Bar Date), detailing their entitlement to Client Assets according to the LLP's records as at 6 April 2023
'Client Money'	Money that the LLP has received, held and/or treated as client money in accordance with the Client Money Rules
'Client Money Entitlement'	The amount of each Client's claim to Client Money
'Client Money Rules'	CASS 7 and CASS 7A

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<b>'Clients' and Creditors' Committee' or 'Committee'</b>	The committee established to represent the interests of all Clients and Creditors and assist the JSAs in the making of certain decisions, representing the whole Client and Creditor body
<b>'CMP'</b>	The Client Money Pool, being the pool of pre-Special Administration Client Money held on trust by the LLP in accordance with the Client Money Rules, pooled in accordance with those rules for the purpose of distributing Client Money
<b>'Compensation Deed'</b>	The Deed which sets out the mechanism by which the FSCS funds compensation payments to Clients via the JSAs
<b>'Costs Contribution'</b>	Each Client's contribution to the costs of returning Custody Assets
<b>'Costs Contribution Reserve'</b>	The reserve, comprising all Clients' Costs Contributions, for the costs of achieving Objective One
<b>'Court'</b>	The High Court of Justice, Business and Property Courts of England & Wales
<b>'Creditor'</b>	Any party who is owed monies by the LLP, including Trade Creditors and Clients with a Client Money and/or Custody Asset shortfall and Secured Creditors, Preferential Creditors, Secondary Preferential Creditors and ordinary Unsecured Creditors
<b>'Custody Assets'</b>	Securities (including stocks, shares and other investments) held for and on behalf of the Clients by the LLP and/or WT Nominees as at the date of the JSAs' appointment
<b>'Designated Members'</b>	The LLP's designated members, being Mr Dance and WealthTek Capital Limited
<b>'Distribution Instruction Date'</b>	The date the proposed distribution of Client Assets to the Client, another person or alternative broker is intended to be instructed by the JSAs as specified in the Client Assets Confirmation Statement
<b>'Distribution Plan'</b>	The distribution plan under Chapter 3 of the Rules setting out how Custody Assets will be returned to Clients and how the costs of the Special Administration will be allocated, which was approved by the Court on 23 July 2024
<b>'Estate'</b>	The LLP's assets and liabilities generally, excluding Client Assets
<b>'Estate Assets'</b>	Assets belonging to the LLP that will be realised for the benefit of Creditors, subject to the deduction of applicable costs and expenses, but which are not Client Assets
<b>'FCA'</b>	Financial Conduct Authority
<b>'FSCS'</b>	Financial Services Compensation Scheme
<b>'FSMA'</b>	Financial Services and Markets Act 2000
<b>'GHCCM'</b>	GHC Capital Markets Limited, the Nominated Broker
<b>'HMRC'</b>	HM Revenue & Customs
<b>'Intermediaries'</b>	Individuals and/or corporate entities who have introduced Clients to the LLP

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<b>'Investment Bank'</b>	An entity incorporated in the United Kingdom, which has permissions under FSMA to carry out certain regulated activities and holds Client Assets
<b>'JIMs'</b>	Shane Crooks, Mark Shaw and Emma Sayers, the former Joint Interim Managers appointed on 4 April 2023, until they were then appointed as JSAs on 6 April 2023
<b>'JSAs' or 'we'</b>	The Joint Special Administrators, being Shane Crooks, Kirsty McMahon and Emma Sayers of BDO LLP (Kirsty McMahon replaced Mark Shaw, also of BDO LLP, as a JSA on 14 October 2024)
<b>'Mr Dance'</b>	Jonathan/John Edward Dance
<b>'Net Property'</b>	Floating charge realisations after costs and payment of Preferential and Secondary Preferential Creditors in full
<b>'Nominated Broker'</b>	Any persons that the JSAs notify as being a Nominated Broker to receive the Client Assets in accordance with Regulation 10B
<b>'NRF'</b>	Norton Rose Fulbright LLP, the solicitors instructed to advise the JSAs in that capacity
<b>'Objectives'</b>	The three statutory objectives set out in Regulation 10(1) of the Regulations, namely Objective One, Objective Two and Objective Three
<b>'Objective One'</b>	To ensure the return of client assets as soon as is reasonably practicable
<b>'Objective Three'</b>	To either: (i) Rescue the Investment Bank as a going concern, or (ii) Wind it up in the best interest of the creditors
<b>'Objective Two'</b>	To ensure timely engagement with market infrastructure bodies and the Authorities pursuant to regulation 13 of the Regulations
<b>'Period'</b>	6 October 2025 to 5 April 2026
<b>'Platform'</b>	The LLP's electronic database used by Clients and Intermediaries known as WIN and/or Portfolio, developed in conjunction with Contemi Solutions (London) Limited
<b>'Portal'</b>	BDO's online portal for Clients and Creditors, at <a href="https://brportal.bdo.co.uk">brportal.bdo.co.uk</a> , in relation to general Client and Creditor updates and communications
<b>'Post-appointment Client Money'</b>	Client Money received after the PPE (representing income and receipts deriving from underlying Client Assets, including in respect of corporate actions), to be held separately from the CMP and distributed in accordance with CASS 7A
<b>'Post-Distribution Shortfall'</b>	Any remaining shortfall suffered by a Client after taking into account any returns of Client Assets under the Distribution Plan, distributions of Client Money and the Costs Contribution
<b>'PPE'</b>	Primary pooling event as defined under CASS 7A, resulting in the formation of the CMP at the time the LLP entered Special Administration

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<b>'Preferential Creditors'</b>	Claims for unpaid wages earned in the four months prior to Special Administration up to £800, holiday pay and unpaid pension contributions in certain circumstances. Where a decision is being sought from Preferential Creditors, these will include Secondary Preferential Creditors
<b>'Prescribed Part'</b>	Where a body corporate has granted a floating charge after 15 September 2003, under Section 176A of the Act (as applied by the Regulations) a proportion of the Net Property available to a qualifying floating charge holder is set aside for the Unsecured Creditors of that body corporate
<b>'Proposals'</b>	The JSAs' statement of proposals for achieving the purpose of the Special Administration
<b>'Recoveries Proceeds'</b>	Any monies (including the proceeds of property recovered) which represent recoveries of Client Assets or Client Money (as applicable) which should have been, but were not, held by the Firm at the Administration Date, or any monies representing redress payments and/or compensation obtained for the benefit of a Client or Clients of the Firm, other than compensation payable by FSCS
<b>'Redundancy Payments Service'</b>	A government department that pays outstanding entitlements to employees (up to certain statutory limits) in the event their employer is insolvent
<b>'Regulations'</b>	Investment Bank Special Administration Regulations 2011
<b>'Rules'</b>	Investment Bank Special Administration (England and Wales) Rules 2011
<b>'Sapia'</b>	Sapia Partners LLP
<b>'Sapia Voluntary Payment'</b>	A payment of £19,137,950 to be received by the JSAs pursuant to a settlement between Sapia and the FCA
<b>'SIPP'</b>	Self-Invested Personal Pension
<b>'Secondary Preferential Creditors'</b>	Where a company enters into Special Administration on or after 1 December 2020, claims for unpaid VAT, PAYE deductions, Employee National Insurance Contributions (NICs) deductions, student loan repayment deductions and amounts withheld under the construction industry scheme
<b>'Secured Creditors'</b>	Creditors whose debt is secured over the LLP's property
<b>'Segregated Trust Account'</b>	The bank account operated by the JSAs to receive compensation due to Clients from the FSCS
<b>'Special Administration'</b>	Investment Bank Special Administration, an insolvency process under the Regulations - which the LLP entered on 6 April 2023
<b>'Special Administration Order'</b>	Order of the High Court made on 6 April 2023 with effect from 12:45 hours, placing the LLP into Special Administration and appointing the JSAs as special administrators
<b>'Surplus Assets'</b>	Custody Assets held to which Clients have no claim according to the Platform

<b>'Sweep Payments'</b>	The payment to Clients of funds received after their Transfer/Distribution relating to Post-appointment Client Money, together with liquidation proceeds for fractional entitlements.
<b>'the LLP'</b>	Wealthtek Limited Liability Partnership trading as: WealthTek, Vertem Asset Management and Malloch Melville
<b>'the Report'</b>	This report, prepared and sent in accordance with Rules 122 and 123 of the Rules
<b>'Trade Creditors'</b>	Any party who is not a Client that is owed an amount by the LLP, including Preferential, Secondary Preferential and Unsecured Creditors
<b>'Transfer/Distribution Instruction Dates'</b>	The Transfer Instruction Date and Distribution Instruction Date
<b>'Transfer/Distribution Instruction Date Notices'</b>	Notice stating the proposed Transfer/Distribution Instruction Date
<b>'Unsecured Creditors'</b>	Creditors who are neither secured nor preferential
<b>'WT Nominees'</b>	WealthTek Nominees Limited

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# 1. KEY INFORMATION

## 1.1. Background

Shane Crooks, Mark Shaw and Emma Sayers were appointed as JSAs of the LLP on 6 April 2023 by the Special Administration Order following an application by the FCA.

On 14 October 2024, Mark Shaw was replaced as JSA by Kirsty McMahon.

The affairs, business and property of the LLP are being managed by the JSAs, who act as agents of the LLP and without personal liability.

Under the provisions of paragraph 100(2) of Schedule B1 to the Act (as applied by Regulation 15 of the Regulations), the JSAs carry out their functions jointly and severally (meaning any action can be done by one or more of the JSAs).

Nothing in this Report is intended to waive any form of legal privilege held by the LLP or the JSAs.

## 1.2. Purpose of the Report

This is the sixth six-month progress report in relation to the Special Administration, for the period from 6 October 2025 to 5 April 2026.

The main purpose of the Report is to provide Clients and Creditors with an update on the progress of the Special Administration during the Period, including progress made by the JSAs in pursuing the Objectives of the Special Administration.

This introductory section seeks to provide a summary of the key matters that have been progressed during the Period, and which are outlined in further detail in the subsequent sections of the Report.

In addition to providing Clients and Creditors with an update on the progress of the Special Administration, the JSAs are seeking approval from WealthTek's Clients for the remuneration incurred in pursuit of Objective One during the third year of the Special Administration (i.e. the period 6 April 2025 to 5 April 2026, 'Year 3'), specifically in relation to that part of their remuneration that relates to Client Money.

As set out at paragraph 2.2.6 of the Report, Client Money is treated differently to Custody Assets in that it is distributed under CASS 7A, rather than under the terms of the Distribution Plan. As such, the costs incurred by the JSAs in relation to the realisation and distribution of Client Money are not covered by the Costs Contribution contained within the Distribution Plan.

A resolution was sought from the Committee for the approval of the JSAs' remuneration incurred in connection with dealing with the Client Money during Year 3. However, as insufficient members of the Committee participated in the resolution process, the resolution was not passed.

In accordance with the Rules, when the Committee does not make the requisite determinations, the general body of Clients and Creditors is responsible for approving the JSAs' remuneration, with the exception of Objective One remuneration, which is approved by Clients only.

Information concerning the approvals being sought can be found at Section 5 and Appendix G.

We would encourage the reader to review this Report in conjunction with all other reports and updates regarding the Special Administration. These are available on the [brportal.bdo.co.uk](https://brportal.bdo.co.uk) portal or through the JSAs' website [www.bdo.co.uk/en-gb/insights/advisory/business-restructuring/wealthtek-administration](https://www.bdo.co.uk/en-gb/insights/advisory/business-restructuring/wealthtek-administration).

## 1.3. Summary of actions taken in the Period

As previously reported, on 4 April 2023 the FCA imposed requirements on the LLP immediately to cease all regulated activities for which it had Part 4A FSMA permissions. The LLP has therefore not

undertaken any regulated activity in the Period, except to the extent permitted by the FCA in order to effect distributions to Clients of Client Assets.

A key focus for the JSAs during the Period has been the implementation of the Distribution Plan and the return of Client Assets and FSCS compensation to the remaining Clients whose Client Assets have yet to be returned. Substantial progress has been made in this regard, such that by the end of the Period, there remain only 8 Clients (with account balances of £1,000 or more) who have not yet provided actionable instructions for the return of their Client Assets.

During the Period, the JSAs have:

- Continued to safeguard the LLP's hard copy and electronic books and records;
  - Undertaken routine reconciliations of Custody Assets held;
  - Undertaken daily reconciliations of pre-Special Administration Client Money and Post-appointment Client Money;
  - Continued to deal with Client queries via email, post and telephone;
  - Issued Clients with Transfer/Distribution Instruction Notices and updated Client Assets Confirmation Statements, via either their individual Client portals or in hard copy, setting out the proposed Transfer/Distribution Instruction Dates in respect of their Custody Assets and Client Money;
  - Returned a further £4.42m of Custody Assets and £0.12m of Client Money to 61 Clients, bringing the total to £97.33m of Custody Assets and £2.10m of Client Money to 965 Clients;
  - Monitored the settlement of transferring Client Assets held with both CACEIS and unit trust managers;
  - Issued Clients with Sweep Payment notices, via either their individual Client portals or in hard copy, setting out the amounts received and the proposed payment date;
  - Issued Sweep Payments totalling £895,665 to 296 Clients;
  - Issued updates to Clients and Creditors on key matters arising in the course of the Special Administration;
  - Continued to liaise with, and provide information requested by, the FSCS to allow it to determine Client eligibility for compensation;
  - Engaged with the FSCS in relation to ongoing Client eligibility, and paid compensation to those Clients whose eligibility has been confirmed;
  - Engaged with the Nominated Broker and numerous other alternative brokers in relation to the transfer and distribution of Client Assets pursuant to the Distribution Plan;
  - Issued instructions to the LLP's custodian, CACEIS, in relation to the transfer of Client Assets, and continued engagement with CACEIS in relation to ongoing custody and transfer matters;
  - Where appropriate, corresponded with Clients and issued Clients with stock transfer forms to sign in order to perfect the formal transfer of the certificated shares to the LLP;
  - Dealt with the stamp duty tax arising on the transfer of the share certificates;
  - Engaged with share registrars regarding the transfer of certificated shares to the LLP and accounted for dividends received;
  - Liaised with HMRC in respect of the irregularities identified in connection with the LLP's historic management of certain ISA accounts, securing a positive outcome for affected Clients, whose accounts have been confirmed to retain their ISA status;
  - Facilitated the transfer of the ISA accounts impacted by irregularities following HMRC's positive determination;
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- Liaised with the FCA regarding the Barclays Voluntary Payment (further details of which can be found later in this report);
- Liaised with Clients regarding the Barclays Voluntary Payment and making payments to eligible Clients (either directly, or to their chosen broker);
- Engaged with Sapia (through its advisors), the FCA and the FSCS in relation to the Sapia Voluntary Payment;
- Engaged with share registrars in relation to the transfer and sale of Surplus Assets and the related withheld dividend income;
- Enquired about the LLP's VAT position to ascertain whether any VAT payable on costs and expenses of the Special Administration can be recovered by the JSAs;
- Investigated pension related inquiries concerning the retained employees;
- Liaised with the FCA and FSCS as required; and
- Issued all required statutory notifications and reports in accordance with the Regulations and the Rules.

Further details of the work undertaken by the JSAs during the Period are provided in section 2.

## 1.4. Return of Client Assets

### 1.4.1. Transfer/distribution of Client Assets

At the time of preparing this Report the JSAs have processed the return of Client Assets for 965 Clients.

Transfer/Distribution Instruction Dates will continue to be provided to Clients once all conditions necessary for the return of their Client Assets under the Distribution Plan have been met.

The JSAs' records indicate that 8 Clients, with a Client Asset balance of £1,000 or more, have neither engaged with the Nominated Broker nor provided alternative instructions for the return of their assets. The JSAs encourage all Clients to engage in this process as soon as possible. In this regard, the JSAs will shortly consider issuing a Long-Stop Date Notice under the terms of the Distribution Plan, which will provide them with the ability to deal with remaining Client Assets in respect of those Clients who have yet to provide transfer instructions.

## 1.5. Return to Creditors

The table below summarises the anticipated outcome for Creditors (as opposed to Clients), based on the information currently available. Please note that this may be subject to change.

Class of creditor	Current estimate	Previous estimate
Secured creditors	N/A	N/A
Preferential creditors	Nil	Nil
Secondary preferential creditors	Nil	Nil
Unsecured Creditors <sup>1</sup>	Nil	Nil

1. As at the date of appointment, the LLP had no outstanding floating charge security. Therefore, the Prescribed Part will not apply in the Special Administration.

## 1.6. What Clients and Creditors need to do

As set out at paragraph 1.2 above, the purpose of the Report is to: (a) provide Clients and Creditors with an update on the progress of the Special Administration; and (b) seek approval of the JSAs' remuneration incurred in pursuit of Objective One in Year 3, specifically in relation to that part of their remuneration that relates to Client Money.

### General action

Clients who have yet to engage with the Nominated Broker or provide alternative instructions for the return of their Client Assets should do so at their earliest convenience in order to ensure the return of their Client Assets as soon as possible.

### Written resolution procedure

Notice of a written resolution procedure is attached at Appendix H. In order to vote, please complete the voting form attached at appendix I.

**Clients who have not assigned their rights to the FSCS (either because they were not eligible for, or chose not to accept, FSCS compensation) are entitled to vote on this issue (i.e. because when accepting FSCS compensation, Clients' rights are automatically assigned to the FSCS). Clients who have accepted FSCS compensation are therefore not entitled to vote.**

Please return the voting form by post to: WealthTek Team, Business Restructuring, 5 Temple Square, Temple Street, Liverpool L2 5RH, or via email to [BRCMTLondonandSouthEast@bdo.co.uk](mailto:BRCMTLondonandSouthEast@bdo.co.uk) on or before 22 May 2026, the Closing Date.

## 1.7. Clients' and Creditors' rights

An overview of the rights of Clients and Creditors is attached at Appendix B.

If there are any matters relating to the affairs of the LLP and/or its Designated Members that you consider merit investigation, you should provide details to the JSAs using the contact details below (to the extent you have not already done so).

## 1.8. Contact details

Contact: The WealthTek Team, BDO LLP, 5 Temple Square, Temple Street, Liverpool L2 5RH  
Tel: +44 (0)113 521 4470 or +44 (0)151 351 4700  
Email: [WealthTekClients@bdo.co.uk](mailto:WealthTekClients@bdo.co.uk) or [WealthTek@bdo.co.uk](mailto:WealthTek@bdo.co.uk)  
Reference: 00426532

## 2. PROGRESS IN THE PERIOD

### 2.1. Overview

During the Period, the JSAs have continued to pursue their strategy to achieve the three statutory Objectives of the Special Administration under the Regulations. A significant amount of time has continued to be spent engaging with brokers to prepare for and implement the transfer/distribution of Client Assets, preparing and issuing the associated notices to Clients including updated Client Assets Confirmation Statements, and in preparing and issuing Sweep Payment notices and processing the payments.

Additionally, the JSAs have continued to liaise with HMRC regarding the issues impacting certain ISA accounts managed by the LLP. HMRC reached a determination in the Period, resulting in a positive outcome for affected Clients whose accounts will retain their ISA status upon transfer to a registered ISA manager. The JSAs have been facilitating these transfers following HMRC's determination.

### 2.2. Objective One - Return of Client Assets

#### 2.2.1. Securing all known Custody Assets and Client Money

The JSAs have continued to secure and routinely reconcile the known Custody Assets and Client Money.

The overall Client Assets shortfall stands at £80.8m.

Further details of the Client Assets are set out below.

#### 2.2.2. Custody Assets held at CACEIS and Barclays

The JSAs continue to liaise with the LLP's custodian, CACEIS, which held Custody Assets valued at c.£96.5m as at 4 April 2023 (the date of the JIMs' appointment, which preceded the JSAs' appointment by a short period). CACEIS continue to hold the remaining Custody Assets (i.e. those that have not already been returned to Clients), together with income and assets resulting from corporate actions since the JSAs' appointment (to the extent they have not already been transferred to Clients).

The JSAs' team continue to have access to the CACEIS electronic portal, which allows access to the corporate actions processed by CACEIS. This allows the JSAs' team to undertake regular reconciliations of Custody Assets and Client Money (including Post-appointment Client Money).

Post-appointment Client Money comprises dividends, coupon payments and similar rights accruing on Custody Assets since the date of the JSAs' appointment, which have continued to be received by both CACEIS and Barclays during the Period. These receipts are separately accounted for in accordance with CASS 7A and do not form part of the CMP.

As previously reported, the JSAs have established a system for recording and reconciling receipts of Post-appointment Client Money. To date, the JSAs have recorded approximately 6,330 cash events across seven currencies; the total receipts of Post-appointment Client Money on a currency basis are provided below:

Currency	Value (Transaction currency)	Value (£)
CAD	23,459.37	13,180.90
EUR	9,399,919.52	7,860,778.99
USD	2,226,760.88	1,698,974.46
HKD	10,694.53	1,050.52

Currency	Value (Transaction currency)	Value (£)
GBP	19,269,592.83	19,269,592.83
AUD	19,430.87	10,076.16
NZD	0.48	0.23
GBP <sup>1</sup>	875.25	875.25
<b>Total</b>		<b>28,854,529.34</b>

The funds relating to Post-appointment Client Money receipts have been, and will continue to be, distributed alongside, and consistent with, the distribution of the Custody Assets to which the relevant receipts relate. The funds are, as such, Client-specific in a similar way to Custody Assets.

As previously reported, the LLP cannot undertake regulated activity and is therefore not in a position to make any elections on optional corporate actions in relation to Custody Assets, such as rights issues. The JSAs continue to record and reconcile any adjustments resulting from mandatory corporate actions, such as dividends and stock splits. To date, the JSAs have recorded approximately 210 stock events including mergers, rights issues, stock splits and spin offs.

### 2.2.3. Unit trusts

At the time of the appointment of the JSAs, the Platform indicated that the value of Custody Assets which were held in unit trusts was £58.4m. The value (as at 6 April 2023) of the confirmed unit trust holdings identified by the JSAs is £41.6m, however, this includes £1.7m of Surplus Assets i.e. assets to which Clients have no claim according to the Platform. Therefore, the confirmed unit trust holdings to which Clients do have a claim is £39.9m, representing a shortfall of £18.5m.

The investments in the unit trusts are held in the name of WT Nominees. WT Nominees is a separate legal entity to the LLP, of which the LLP is the sole shareholder. As previously reported, shortly after the JSAs' appointment, steps were taken to pass a shareholder resolution removing the previous directors (Mr Dance and Ms O'Sullivan) and appointing an independent director in their place. To help facilitate the return of assets under the Distribution Plan, WT Nominees was subsequently placed into Creditors' Voluntary Liquidation with Kirsty McMahon and Shane Crooks (two of the current JSAs) being appointed as joint liquidators on 4 September 2024 ('Joint Liquidators').

During the Period, the unit trust positions have continued to be reconciled on a regular basis (albeit certain of the unit trust managers provide statements only infrequently). The reconciliation includes corporate actions that have taken place since the date of the appointment of the JSAs. The Post-appointment Client Money relating to these corporate actions has been, and will continue to be distributed alongside, and consistent with, the distribution of the Custody Assets to which the relevant receipts relate. These Post-appointment Client Money receipts are included in the table at 2.2.2 above.

Following WT Nominees being placed into Creditors' Voluntary Liquidation, the unit trust managers reviewed and accepted an updated Authorised Signatory List and assessed the Anti-Money Laundering ('AML') status of all accounts to ensure compliance. Subsequently, transfers and redemptions of unit trust Client Assets could be instructed.

Notwithstanding the above, as previously reported additional work has been required to resolve outstanding issues raised by the unit trust managers, which has continued in the Period, to ensure that unit trust transfers could be undertaken.

<sup>1</sup> This Post-appointment Client Money receipt is held separately in the JSAs' RBS account.

#### 2.2.4. ISA accounts

As previously reported, the JSAs sought a determination from HMRC regarding the status of certain ISA accounts managed by the LLP prior to June 2021. HMRC has now confirmed that affected clients' ISA accounts will retain their ISA status, providing the account is transferred to a registered ISA manager.

The JSAs have notified affected Clients, the Nominated Broker and other alternative brokers who had agreed to accept ISA transfers pending HMRC's determination. The JSAs have continued to facilitate the transfer of affected ISA accounts following receipt of HMRC's determination.

#### 2.2.5. Custody Assets shortfall

The shortfall in respect of the Custody Assets is set out in the table below:

Description	Note	Value £*
Total valuation of Custody Assets on the Platform as at 6 April 2023	1	216,476,986
Custody Assets confirmed to be held by custodians as at 6 April 2023	2	138,651,450
Custody Assets held by the LLP in certificated form as at 6 April 2023	3	425,566
Surplus Assets confirmed to be held by custodians as at 6 April 2023	4	(2,739,314)
Custody Assets recorded on Platform but not actually held by LLP on behalf of Clients	5	9,558,651
<b>Current Custody Asset shortfall</b>	<b>6</b>	<b>70,580,633</b>

Notes:

1. This is the JSAs' estimated valuation of Custody Assets indicated as being held by the LLP as at 6 April 2023. This figure was derived by taking the units held in each individual security by all Clients and applying the mid-price recorded on Bloomberg on 6 April 2023. There is a small proportion of Custody Assets which did not have a price available. The JSAs have used alternative methods to value these assets, which inevitably involves a degree of judgement. There are minor differences between the values shown on the Platform as at 6 April 2023 and the values extracted from Bloomberg.
2. This is the confirmed Custody Assets held with custodians valued as at 6 April 2023. The balance comprises assets held at CACEIS totalling £96,548,470, unit trusts totalling £41,578,735 and assets held by other Custodians totalling £524,245.
3. This is the value of certificated shares in the name of Clients held by the LLP.
4. The reconciliation has identified assets valued at c. £2.7m which are confirmed as being held with custodians, but the Platform records do not indicate that any Clients have a claim to these assets.
5. As previously reported, the JSAs are aware of one asset with a recorded value of c. £8.5m, which had been included in a Client's portfolio. The JSAs' investigations have identified, however, that the LLP never held the asset on behalf of the Client, and it does not therefore form part of the Custody Assets. Additionally, the JSAs have become aware of seven Clients that hold in their possession certificated shares with a value of c. £1m. These were previously understood to have been held in the name of the LLP and therefore had been included in the shortfall figure. The effect of these adjustments is to reduce the Custody Asset shortfall.

6. The JSAs have made extensive enquiries and do not at this stage anticipate identifying any additional Custody Assets that will materially affect the Custody Assets shortfall.

### 2.2.6. Client Money

As previously advised, the appointment of the JSAs triggered a primary pooling event ('PPE') under CASS 7A, whereby all Client Money held at that time, in various currencies, was pooled to form the CMP. The Client Money paid to the LLP by CACEIS and Barclays totalled £2,669,957.

To date, the JSAs have also realised 142 lines of Surplus Assets, relating to approximately 1.5m shares. This has generated sale proceeds of c£2.69m. Under the terms of the Distribution Plan, these realisations form part of the CMP available for distribution to Clients with a Client Money Entitlement.

The table below sets out the Client Money shortfall (before costs) following the realisation of the Surplus Assets:

As at 6 April 2023:	Value £
Client Money positions on the Platform	12,876,348
Additional claims received	8,352
Client Money held with known custodians upon PPE	2,669,957
<b>Original Client Money shortfall</b>	<b>(10,214,743)</b>
Surplus asset realisations	2,690,536 <sup>1</sup>
<b>Current Client Money Shortfall</b>	<b>(7,524,207)</b>

<sup>1</sup> The Surplus Asset realisations were made in various currencies. This figure represents the converted GBP figure and includes £898 realised in the Period, but which has not yet been received into the accounts operated by the JSAs and is therefore not reflected on the Receipts and Payments account attached at Appendix C.

As detailed in the Client Assets Statements sent to Clients, Client Money is treated differently to Custody Assets in that it is distributed under CASS 7A, rather than under the terms of the Distribution Plan. The JSAs nonetheless have distributed Client Money in parallel with the return of Custody Assets.

Given the Client Money shortfall, each Client will receive a rateable distribution of Client Money held by the LLP based on their Client Money Entitlement (and not their overall losses) and will have an unsecured claim against the LLP in the amount of the shortfall.

The JSAs have, to date, paid an initial, first distribution in respect of Client Money of 19p in the £. This sum has been included as part of the funds included in transfers/distributions to the Nominated Broker or alternative brokers, or it has been paid directly to Clients where they have requested a liquidation of their Client Assets.

In the Period, 32 Clients that only held Client Money (and not Custody Assets) have also received distributions of Client Money in amounts equal to their respective Client Money Entitlements.

#### Second Client Money distribution

Following the realisation of the Surplus Assets detailed above, and the further realisations to be made in relation to the physical share certificates (as detailed below), further Client Money distributions will be paid to Clients with a Client Money Entitlement.

In this regard, the JSAs can confirm the declaration of a second Client Money distribution in the amount of 7.76p in the £. Payment will be made to all Clients with an outstanding Client Money Entitlement (or to the FSCS, where a Client has been compensated, as a result of the assignment of rights to the FSCS) during June.

Further Client Money distributions are anticipated once the JSAs have resolved certain tax matters connected to the sale of the Surplus Assets. An update on the quantum and timing of the further distributions will be provided in due course.

### **2.2.7. Physical share certificates**

As previously advised, the LLP held approximately 1,715 physical share certificates, relating to shares predominantly held in UK listed companies. The LLP obtained the share certificates from Clients (in whose name the shares are held), on the understanding that the relevant shares would be dematerialised and sold, with the underlying Client being credited with Client Money in an amount equal to the value of the shares. However, whilst a significant proportion of the Clients appear to have received an increased Client Money Entitlement, the process of dematerialising and realising the certificated shares was not in fact undertaken by the LLP.

The JSAs sought legal advice regarding the correct treatment and ownership of these certificated shares and have applied the principles obtained from the legal advice when dealing with this matter in the Client Assets Reconciliation and preparation of the Distribution Plan. In accordance with the Distribution Plan, realisations from these shares will be added to the CMP for distribution to Clients with a Client Money Entitlement.

Where appropriate, physical share certificates have been returned to Clients as the Distribution Plan has been implemented.

Similarly, where appropriate, certain Clients have been asked to sign a stock transfer form to perfect the formal transfer of the certificated shares to the LLP. Where stock transfer forms have been signed and returned to the JSAs, the JSAs have forwarded these to the share registrars.

Share certificates for approximately 832,800 shares have been submitted to the registrars for transfer to the LLP. To date, new share certificates have been issued in the name of the LLP for 127,915 shares, with an estimated aggregate value of approximately £691k. These shares are expected to be realised, and the proceeds allocated to the CMP, in due course.

The JSAs have begun receiving dividends on the shareholdings now held in the LLP's name. In addition, repayments have been received from Clients in respect of dividends and sale proceeds relating to unperfected certificated shareholdings (i.e. dividends received by Clients prior to the transfer of the shares to the LLP). Total income in this regard received to date amounts to £198,820.

The JSAs will continue to engage with affected Clients to resolve the outstanding issues in relation to these shares.

### **2.2.8. Client Assets Statements**

There remains a disagreement in respect of only one Client's claim, which the JSAs' team continue to attempt to resolve (albeit the dispute has not impacted the return of Client Assets to other Clients).

A number of Clients have yet to submit Client Assets Claim forms, but these Clients have very small (or nil) account balances, so limited further engagement is expected from these Clients.

### **2.2.9. Client Assets Confirmation Statements**

As previously reported, the JSAs issued Clients with their Client Assets Confirmation Statements on 12 September 2024. The Client Assets Confirmation Statements set out the agreed claims in respect of both Custody Assets and Client Money.

Members of the JSAs' team have been available to explain the contents of the Client Assets Confirmation Statements and deal with related Client queries. The Client queries in this regard have been received and dealt with in writing, via email and telephone, as appropriate.

### 2.2.10. Transfer/Distribution of Client Assets

In the Period, a further 61 Clients have had their Client Assets returned, across 72 accounts, totalling £4.42m in Custody Assets and £0.12m in Client Money (together with, where applicable, FSCS compensation).

In total, 965 Clients have now had their assets returned, across 1,067 accounts, totalling £97.33m in Custody Assets and £2.10m in Client Money (together with, where applicable, FSCS compensation).

In addition, Post-appointment Client Money as detailed below has also been transferred/distributed to Clients:

Currency	In the Period	Total
AUD	-	3,821
CAD	-	13,034
EUR	-	280,931
GBP	1,314,210	14,401,881
USD	1,019,278	2,557,826

Client Assets have been returned either through a transfer to the Nominated Broker, a distribution to an alternative broker of the Client's choice, or through the liquidation of Custody Assets, as further detailed in the sections below.

The JSAs will continue to work towards returning, as far as possible, the remaining Client Assets under their control.

### 2.2.11. Nominated Broker process

In the Period, a further 12 Clients have transferred their assets to GHCCM, as the Nominated Broker. 123 Clients in total have now transferred to GHCCM.

A significant number of Clients have elected to opt-out of a transfer to the Nominated Broker, in order to either: (i) transfer their Client Assets to an alternative broker (invariably where Clients are represented by certain Intermediaries); or (ii) liquidate their Custody Assets.

In order to conduct the transfer of relevant Clients to the Nominated Broker, it has been necessary for the JSAs to:

- Prepare updated valuations for all transferring Clients;
- Liaise with GHCCM in relation to the onboarding status of Clients and arranging for tranches of Clients to be transferred as available;
- Issue notices to Clients confirming their Proposed Transfer Instruction Dates;
- Coordinate trade and settlement dates with GHCCM and manage the practical elements of the transfer, including issuing the transfer instructions to the LLP's custodian and the various unit trust managers; and
- Arrange payment of the Client Money balances to GHCCM as part of the Client Transfers.

### 2.2.12. Alternative Brokers

During the Period, a further 11 Clients have transferred to different alternative brokers. To date, 842 Clients have transferred to 26 different alternative brokers, or have opted to liquidate their Custody Assets.

As part of this process, with each of the alternative brokers, it has been necessary for the JSAs to:

- Prepare updated valuations for Client accounts;
- Liaise with the transfer teams at the various alternative brokers to coordinate the transfers, agree the data required to facilitate the same and agree trade and settlement dates;
- Issue the necessary notices to Clients confirming their Proposed Distribution Instruction Dates, including updated Client Assets Confirmation Statements, in accordance with the Distribution Plan;
- Input the necessary instructions for the transfer through the LLP's custodian, and issuing the necessary transfer instruction forms to the relevant unit trust managers;
- Arrange payment of Client Money to each Client's receiving broker; and
- Monitor the settlement of the transfers and resolve any related issues or complications that arise.

### 2.2.13. Liquidations

During the period, a further 18 Clients have issued instructions to liquidate their Custody Assets. Of those 18 Clients: 7 Clients have received their sale proceeds, together with their Client Money and Post-appointment Client Money; 9 Clients have already or will shortly be issued with a Proposed Distribution Instruction Date; and the JSAs are waiting for 2 Clients to finalise their FSCS eligibility outcome before their Liquidation proceeds can be paid.

As part of this process, it has been necessary for the JSAs to:

- Prepare updated valuations for Client accounts ahead of liquidation;
- Issue the sale instructions through the LLP's custodian, and issue the necessary redemption instruction forms to the relevant unit trust managers (approximately 400 sale / redemption instructions);
- Monitor the settlement of the sales and resolve any related issues or complications that arose;
- Complete a reconciliation of the sale proceeds for each Client and prepare a liquidation schedule setting out the details of the sale for each line of stock held (approximately 9,600 lines at Client level that needed to be reconciled and detailed on the liquidation schedules provided to Clients);
- Issue the necessary notices to Clients confirming their Proposed Distribution Instruction Dates, including updated Client Assets Confirmation Statements and a liquidation schedule detailing the sale proceeds, in accordance with the Distribution Plan;
- Engage with alternative brokers, where Clients had requested that their liquidation proceeds be paid to a broker, rather than to them personally, to confirm payment details;
- Validate bank information received/held with Clients ahead of payment; and
- Arrange payment of the liquidation proceeds and Client Money to each Client, either directly or to their proposed alternative broker (approximately £498,239 and \$1,878,930 of liquidation proceeds have been distributed in the Period).

In the Period, the JSAs have also arranged for the distribution of Client Money totalling £2,064.98 to 31 clients, who only held Client Money in their accounts.

### 2.2.14. Tax issues

Whilst the JSAs are unable to provide tax advice to Clients, they are aware that the failure of WealthTek, the distribution of Client Assets, the payment of FSCS compensation, the Barclays Voluntary Payment and the Sapia Voluntary Payment may cause a number of issues and uncertainties for Clients.

Clients should consider seeking independent tax advice in respect of their own individual financial position.

#### 2.2.15. SIPPs

All SIPP accounts have now been transferred to the Nominated Broker or an alternative broker, however, the JSAs continue to liaise with SIPP providers in relation to the accounts of the underlying Clients, specifically in relation to Sweep Payments and Recoveries Proceeds.

#### 2.2.16. Further potential recoveries for the benefit of Clients

The JSAs are continuing to liaise with the FCA which, as previously reported, is conducting a regulatory and criminal investigation into the LLP and Mr Dance (including potential regulatory breaches relating to Client Money and Custody Assets).

The Restraint Order over Mr Dance's assets, obtained by the FCA, remains in place. This preserves the assets and ensures that they remain available for a possible future confiscation order, which can only be made following a criminal conviction.

As previously reported, Mr Dance has been charged with nine offences relating to alleged fraud and money laundering between 2014 and 2023, pleading not guilty to all charges. Mr Dance's trial is scheduled to begin in September 2027.

The FCA's civil case against Mr Dance (which had already been stayed as far as the LLP is concerned), has been stayed until the conclusion of the criminal proceedings, due to the overlapping nature of the respective proceedings.

The JSAs understand that any recoveries made by the FCA in any proceedings resulting from its investigations will be for the benefit of those who have been adversely affected and/or suffered a loss as a result of contravention of the relevant regulatory requirements i.e. the Clients (and, if applicable, the Creditors) of the LLP.

#### 2.2.17. Barclays Voluntary Payment

As previously reported, pursuant to a settlement between Barclays and the FCA (details of which can be found [here](#)), a voluntary payment of £6,281,757 was made by Barclays on 23 July 2025. The Barclays Voluntary Payment was treated as Recoveries Proceeds under the Distribution Plan and distributed on a pari passu basis between all Clients with a Post-Distribution Shortfall who continue to have outstanding losses (including following receipt of FSCS compensation).

In the Period, further payments totalling £85,720.47 have been made to Clients, with a total sum of £4,121,999.71 having now been paid. Further payments are expected to be made in due course as the remaining eligible Clients provide payment instructions.

#### 2.2.18. Sapia Voluntary Payment

Although outside of the Period, the JSAs can confirm that pursuant to a settlement between Sapia and the FCA (details of which can be found [here](#)), Sapia has agreed to make a voluntary payment of £19,137,950. As noted in the FCA press release referenced above, an additional payment of £500,000 will be made by Sapia directly to the FSCS in respect of the assigned claims of FSCS compensated Clients as part of the overall settlement agreed with the FCA.

The Sapia Voluntary Payment will be treated as 'Recoveries Proceeds' under the Distribution Plan and will be distributed on a pari passu basis between all Clients with a 'Post-Distribution Shortfall' who continue to have outstanding losses (including following receipt of FSCS compensation). For the purpose of the Sapia Voluntary Payment, FSCS will not receive any further payment under the Distribution Plan.

Eligible Clients will be contacted directly with further information during May 2026.

#### 2.2.19. Liaising with the FSCS

As previously reported, FSCS compensation is available for eligible Clients. This compensates Clients in respect of the costs of returning Client Assets and the losses arising from the Client Assets shortfalls, up to the maximum available cover of £85,000 per Client.

The JSAs continue to work closely with the FSCS in respect of the small number of remaining Clients whose eligibility has yet to be determined. There are 9 Clients whose eligibility has yet to be confirmed, and approximately 328 Clients that have either opted out of FSCS coverage, were ineligible for FSCS coverage, or have accounts with negligible or nil balances.

To date, the JSAs have made five drawdown requests for funds from the FSCS under the terms of the Compensation Deed totalling £32,549,045. This amount represents the Client compensation (£20,477,584.07) and Costs Contributions (£12,071,460.45) advanced by the FSCS on behalf of the 946 Clients that have, to date, been determined as eligible.

Of the £20,477,584.07 received by way of Client compensation, the sum of £20,367,525 has been paid by the JSAs to Clients. The balance will either be paid: (i) directly to the Clients on receipt of the necessary Client information to enable payment to be made; or (ii) to the Client's chosen broker as part of the Client's transfer/distribution (where the Client has instructed the JSAs that they do not want to be paid their compensation directly).

There are several cheques that have been issued to Clients which were not banked in the six-month period before their expiry. If you have an expired cheque, please contact the JSAs at your earliest convenience.

#### **2.2.20. Communications with Clients and Intermediaries**

The JSAs have continued to utilise a number of methods for communicating with Clients (and their Intermediaries) in relation to their affairs and the progress of the Special Administration. These include: posting updates on their dedicated website ([www.bdo.co.uk/en-gb/wealthtek-administration](http://www.bdo.co.uk/en-gb/wealthtek-administration)); issuing correspondence and resolving queries by email, and by post to those Clients who prefer to receive paper documents rather than electronic communications; posting documents and updates to the dedicated online portal for all Clients and Creditors of the LLP ([www.brportal.bdo.co.uk](http://www.brportal.bdo.co.uk)); and the operation of the dedicated Client telephone hotlines.

### **2.3. Objective Two - Engagement with market infrastructure bodies and the Authorities**

#### **2.3.1. Financial Conduct Authority**

The JSAs have continued to maintain frequent contact with the FCA during the Period and will continue to do so in relation to the implementation of the Distribution Plan, regulatory compliance and statutory reporting requirements, and the overall strategy of the Special Administration.

#### **2.3.2. Financial Services Compensation Scheme**

As noted, the JSAs have maintained regular contact with the FSCS, and have been working closely with the FSCS in order to confirm eligibility for the remaining Clients and to facilitate the payment of compensation.

### **2.4. Objective Three - rescue the Investment Bank as a going concern or wind it up in the interests of its creditors**

As previously reported, due to the Client Assets shortfall, the imposition by the FCA of requirements that prevent the LLP from carrying out regulated activity, the subsequent cessation of trade and the circumstances surrounding the JSAs' appointment, the JSAs did not consider it possible to rescue the LLP as a going concern. The JSAs have instead focussed on winding-up the LLP's affairs in the best interests of its Creditors.

#### **Other matters**

In addition to the above matters, we have dealt with all statutory matters required by legislation and administrative work incidental to our duties as JSAs in this Special Administration.

## 3. FINANCIAL POSITION

### 3.1. Receipts and Payments

The summaries of receipts and payments in relation to Objective One and the Estate are attached at Appendix C and detail the receipts and payments from the date of the JSAs' appointment to 5 April 2026.

Whilst the summaries of receipts and payments are largely self-explanatory, we comment further on certain items below.

#### 3.1.1. Estate Receipts

During the Period, there were no Estate Assets realisations, other than interest earned on the cash balance held.

#### 3.1.2. Estate Payments

During the Period, a payment of £59,208 (inclusive of VAT) was made in relation to counsel's fees. In accordance with the Court judgment handed down on 28 November 2024, these costs could not be paid as an Objective One expense, and were therefore settled by the Estate.

#### 3.1.3. Objective One Receipts

During the Period, the only receipt was bank interest earned on the cash balance held.

#### 3.1.4. Objective One Payments

PAYE/NIC and Pension scheme contributions, of £134 and £174 respectively were paid in the Period in settlement of outstanding amounts relating to the formerly retained employees.

Further information in relation to payments made is detailed in Appendix E.

#### 3.1.5. Segregated Trust Account

The total amount received from the FSCS is £32,549,045. Of this sum, £20,477,584 has been paid to the FSCS Shortfall Payments Account (in order to pay shortfall compensation due to Clients) and £12,071,460 paid to an account maintained by the JSAs for the purpose of settling Objective One costs.

In addition, the JSAs have received Costs Contributions totalling £60,576 from Clients who have either not been deemed eligible for, or who have opted out of receiving, FSCS compensation.

The remaining balance of £957 relates to accrued bank interest.

#### 3.1.6. FSCS Shortfall Payments Account

The JSAs hold a balance of £198,227, representing: (1) FSCS shortfall compensation due to Clients who have yet to: (i) have their Client Assets transferred to their broker of choice; or (ii) provide sufficient information to enable the JSAs to release the payment; and (2) accrued bank interest.

If you have received your compensation by cheque and it has not been banked, you have six months from the date on the cheque to bank it. If it is not banked within this time, it will become invalid.

#### 3.1.7. Client Money Receipts

During the Period, the amount of £79,207 has been received in relation to dividends received on physical share certificates, with a further £15,322 of bank interest being received.

The JSAs also realised proceeds from the sale of Surplus Assets totalling £2.69m, £2.5m of which was received into the JSAs' Client Money bank account in the Period.

### 3.1.8. Client Money Payments

During the Period, the JSAs have paid £118,279 to Clients in relation to their first Client Money distribution of 19p in the £ on their Client Money Entitlement.

Stamp Duty and insurance in the amount of £4,466 and £3,791 has been paid in relation to realisations on share certificates.

### 3.1.9. Post-appointment Client Money and payment of Liquidation Proceeds

During the Period, the JSAs have paid the following sums to Clients in relation to post-appointment Client Money.

Currency	In the Period	Total
AUD	-	3,821
CAD	-	13,034
EUR	-	280,931
GBP	1,314,210	14,401,881
USD	1,019,278	2,557,826

During the Period, the JSAs have paid the following sums to Clients in relation to liquidation proceeds where Clients have opted to liquidate their assets.

Currency	In the Period	Total
AUD	-	16,651
EUR	-	23,545
GBP	498,239	10,373,436
USD	1,878,930	1,919,433

## 3.2. Estate Assets

No further Estate Assets have been identified or realised in the Period except for gross interest totalling £1,144.

## 3.3. Estate Liabilities

### 3.3.1. Secured Creditors

There were no outstanding charges granted by the LLP at the date of the appointment of the JSAs and, accordingly, there are no Secured Creditors in the Special Administration.

### 3.3.2. Preferential Creditors

Preferential Creditors are represented by claims for unpaid wages earned in the four months prior to the Special Administration of up to £800, and holiday pay and unpaid pension contributions in certain circumstances. The JSAs retained ERA Solutions Limited, a specialist consultancy, to assist with the claims of the LLP's former employees.

As previously reported, subsequent to the appointment of the JSAs, 22 of the LLP's employees were made redundant, resulting in the following estimated preferential claims:

Preferential claims	£
Former employees - arrears of wages and accrued holiday pay	5,324
Redundancy Payments Service - arrears of wages and accrued holiday pay	16,653
<b>Total preferential claims</b>	<b>21,977</b>

In addition, the employer and employee pension scheme deductions for March 2023, in the sum of £5,043, were not paid to the scheme and are expected to result in an additional preferential claim.

As detailed in the return to creditors section of the Report, it is estimated that there will be no distribution to Preferential Creditors.

### 3.3.3. Secondary Preferential Creditor

Where an LLP enters Special Administration on or after 1 December 2020, claims for unpaid VAT, PAYE deductions, Employee National Insurance Contributions (NICs) deductions, student loan repayment deductions and amounts withheld under the construction industry scheme represent Secondary Preferential Creditors.

Deductions in respect of PAYE and NIC for the month of March 2023, in the sum of £26,364, were not paid to HMRC. These are expected to result in a secondary preferential claim although, as previously reported, the claim may be mitigated by set-off of VAT refunds totalling £12,003.

As detailed in the return to creditors section of the Report, it is estimated that there will be no distribution to Secondary Preferential Creditors.

### 3.3.4. Prescribed Part

At the date of appointment, the LLP had no outstanding floating charge security and therefore the Prescribed Part will not apply in the Special Administration.

### 3.3.5. Unsecured Creditors

Unsecured Creditor claims are broadly split between:

- (i) Client shortfall claims, which may arise from any shortfall in Client Money or Custody Assets; and
- (ii) Unsecured Creditors, which include the claims of Trade Creditors, and employees' non-preferential claims (to include the subrogated claim of the Redundancy Payments Service).

Based on the information presently available, unsecured claims from Trade Creditors (i.e. category (ii) above) may total £7,832,961. To date, the JSAs have received claims from Trade Creditors totalling £2,707,972.

Total Client shortfall claims in respect of Client Money and Custody Assets (i.e. category (i) above) are £93,296,090. Whilst the FSCS has compensated eligible Clients, thereby reducing Client Assets shortfall claims, it has a subrogated unsecured claim in respect of any compensated Clients. The total shortfall has, however, been reduced by the Barclays Voluntary Payment of £6,281,757 (and it will be further reduced by: (i) The second Client Money distribution of £999,847; (ii) the Sapia Voluntary Payment of £19,137,950; and (ii) the additional contribution of £500,000 which will be made by Sapia directly to the FSCS in respect of the assigned claims of FSCS compensated Clients).

At the current time, therefore, the JSAs estimate that the value of the claims of the LLP's Unsecured Creditors may be in the region of £69m.

## 4. INVESTIGATIONS

As previously reported, the JSAs have complied with their reporting duties to the Department for Business and Trade in relation to the conduct of all Designated Members (and any de facto or shadow Designated Members) during the three years before the commencement of the Special Administration.

The JSAs have previously undertaken other specific enquiries and investigations in relation to the LLP and its affairs. For reasons of legal professional privilege and to avoid any prejudice in relation to any claims that the JSAs may identify against any third parties, the JSAs are unable to provide any further information in relation to those enquiries at this time. This is normal market practice and in the best interests of Clients and Creditors.

Should any Clients or Creditors have any information relating to the affairs of the LLP and/or its Designated Members that might assist the JSAs with their investigations, they are requested to provide that information to the JSAs as soon as possible.

In its judgment of 28 November 2024, the Court determined that it was not appropriate for the Costs Contribution Reserve to include a provision for the costs of potential future investigations and/or litigation to recover shortfalls in the LLP's holdings of Client Assets, and that the JSAs are under no obligation to pursue such investigations and/or litigation as part of achieving Objective One of the Special Administration (unless they are put in funds to do so).

As matters stand, the JSAs have not received any external or third-party funding to take steps to recover shortfalls in the LLP's holdings of Client Assets. Accordingly, the JSAs have been required to pause their ongoing investigations as they are unable to incur costs without a means of funding them.

The JSAs also continue to consider the availability of any claims to the LLP or the JSAs for the benefit of the LLP's estate (which includes any shortfalls due to Clients which automatically rank as Unsecured Creditors).

## 5. REMUNERATION AND EXPENSES OF THE SPECIAL ADMINISTRATION

### 5.1. Pre-Special Administration costs

The Proposals detailed unpaid pre-Special Administration costs and expenses totalling £193,973 (plus VAT). Approval for these costs to be drawn by the JSAs (subject to Estate Assets realisations being sufficient) will be sought from the Committee (or general body of Clients and Creditors as appropriate) in due course.

### 5.2. JSAs' remuneration

#### 5.2.1. Bases of the JSAs' remuneration

Pursuant to Rule 196 of the Rules, the basis of the JSAs' remuneration may be fixed:

- (i) as a percentage of the value of the property with which the JSAs have to deal;
- (ii) by reference to the time properly given by the insolvency practitioners (as JSAs) and their staff in attending to matters arising in the Special Administration;
- (iii) as a set amount; or
- (iv) as a combination of any one or more of the bases set out above.

As noted below, the JSAs have sought to fix their remuneration in this matter by reference to the time properly spent in attending to matters in the Special Administration.

#### 5.2.2. JSAs' time costs

The table below sets out the time costs incurred by the JSAs and their team in the Special Administration from the date of their appointment to 5 April 2026:

Type of cost	Hours	Time costs £	Av. Rate £
Objective One Costs	20,249.81	8,927,089.79	440.85
Objective Two and Three Costs	2,995.29	1,254,647.76	418.87
<b>Total</b>	<b>23,245.10</b>	<b>10,181,737.55</b>	<b>438.02</b>

Time costs of £1,077,226 (which are included in the table above) have been incurred during the Period. A detailed report of the time incurred by the JSAs, and a narrative of the work undertaken during the Period, is attached at Appendix D.

### 5.2.3. JSAs' expenses

The JSAs have incurred expenses totalling £6,495,017 (plus VAT) from the date of their appointment up to 5 April 2026, £4,192,637 (plus VAT) of which relate to legal fees and expenses (excluding pre-appointment costs). The expenses are apportioned as follows:

Type of Expense	Expenses Incurred £
Objective One Expenses	5,812,784
Objective Two and Three Expenses	682,233
<b>Total</b>	<b>6,495,017</b>

A schedule of all costs and expenses incurred by the JSAs can be found at Appendix E.

### 5.2.4. Prior approval of JSAs' remuneration and category 2 expenses

The costs incurred in respect of the pursuit of Objective One will be applied against and paid out of Client Assets (albeit the majority of Clients do not bear these deductions as they are covered by the FSCS compensation). In any event, the Objective One costs incurred in relation to the return of Custody Assets under the Distribution Plan will be limited to the Costs Contribution Reserve.

The costs incurred in pursuit of Objectives Two and Three will be applied against and paid out of (as far as possible) Estate Assets.

In accordance with the Rules, the Committee or, if the Committee is inquorate, the general body of Clients and/or Creditors, is responsible for approving the JSAs' remuneration.

As previously reported, the Committee approved costs of £3,201,937 (excluding VAT) incurred by the JSAs in respect of the pursuit of Objective One up to 5 April 2024 (i.e. the first year of the Special Administration). These have been paid in full.

Following the second anniversary of the Special Administration, the JSAs sought approval from the Committee for their Objective One remuneration for work undertaken during the second year (i.e. for the period 6 April 2024 to 5 April 2025). However, the Committee was inquorate, meaning that no resolution could be passed, and it was therefore necessary to seek approval from Clients for the JSAs' Objective One remuneration for this period.

Accordingly, on 8 October 2025 the JSAs issued a remuneration report seeking Clients' approval for the following:

	Approval sought £
1. Objective One Remuneration (to be paid out of Custody Assets held by the LLP under Rule 196(1)(b) of the Rules in respect of pursuit of Objective One)	3,617,138.56
2. Client Money Remuneration (to be paid out of the Client Money held in accordance with CASS 7.17.2R)	228,737.43
3. Category 2 expenses incurred by the JSAs in pursuit of Objective One	33,363.32
4. The costs of the liquidation of WT Nominees and any expenses incurred by the liquidators of WT Nominees for the period 5 September 2024 to 4 May 2025 (which are costs and expenses incurred in pursuit of Objective One of the Special Administration)	499,051.67
<b>Total</b>	<b>4,378,290.98</b>

Only Clients who had not assigned their rights to the FSCS were entitled (but not obliged) to vote on the remuneration resolutions (i.e. because Clients' rights are automatically assigned to the FSCS when accepting compensation). Clients who had accepted FSCS compensation were therefore not able to vote.

Following the closure of the decision procedure on 24 October 2025, the JSAs' Objective One remuneration and expenses were approved by the requisite majority of Clients voting in favour of the proposed resolutions.

#### **5.2.5. Limitations on recovery of Objective One costs**

Whilst the JSAs have obtained approval of all Objective One costs which have properly been incurred up to 5 April 2025, the amount available to settle the JSAs' costs incurred in dealing with Custody Assets and the implementation of the Distribution Plan is limited by the Costs Contribution Reserve.

Only c£2.5m of the Costs Contribution Reserve remained available to meet the Objective One costs incurred in the second year. This therefore left a balance of Objective One Costs attributable to Custody Assets of c£1.6m, which will likely not be recovered by the JSAs.

It follows that the further Objective One costs incurred in relation to Custody Assets in the third year of the Special Administration are also unlikely to be recovered by the JSAs. Whilst details of these costs are provided at Appendix D, the JSAs have not sought approval of this element of their costs at this stage.

#### **5.2.6. Approval of further Objective One costs attributable to Client Money**

Whilst the Objective One costs attributable to Custody Assets are limited by the Costs Contribution Reserve, under the Client Money Rules the JSAs may still seek to draw the costs attributable to Client Money from the Client Money held by the JSAs.

A resolution was therefore sought from the Committee for the approval of the JSAs' Objective One remuneration attributable to Client Money incurred in the third year of the special administration (i.e. the period from 6 April 2025 to 5 April 2026), in the sum of £315,642.40 plus VAT. However, insufficient members of the Committee participated in the resolution process, meaning the resolution could not be passed. The JSAs must therefore seek approval of these costs from Clients.

Notice of a written resolution procedure is attached at Appendix H. In order to vote, please complete the voting form attached at appendix I.

As with the previous resolutions, only Clients who have not assigned their rights to the FSCS are entitled (but not obliged) to vote on the remuneration resolutions (i.e. because Clients' rights are automatically assigned to the FSCS when accepting compensation). Clients who have accepted FSCS compensation are therefore not able to vote.

## 6. DURATION OF AND EXIT FROM THE SPECIAL ADMINISTRATION

### 6.1. Duration of the Special Administration

A Special Administration under the Regulations is different to an ordinary administration under the Act as it does not automatically come to an end after 12 months.

The Special Administration will continue until the JSAs consider that the Objectives have been met and, at that point, the JSAs will conclude the Special Administration by:

- (i) putting forward proposals for a Voluntary Arrangement with a view to rescuing the LLP as a going concern;
- (ii) making an application to Court and seeking any order necessary (which could include seeking an order to place the LLP into liquidation); or
- (iii) filing a notice with the Court and Registrar of Companies for the LLP's dissolution.

At the current time, the JSAs remain unable to provide an indication of the likely timeframe for achieving the Objectives, and therefore the likely duration of the Special Administration. Clients and Creditors will receive updates on the JSAs' progress in achieving the Objectives as the Special Administration progresses.

The JSAs are also presently unable to confirm the appropriate exit route from the Special Administration. However, as the prospect of a rescue of the LLP as a going concern is considered, at best, remote, it is unlikely that the exit will be via a Voluntary Arrangement. Further information on the likely exit route will be provided to Clients and Creditors as the Special Administration progresses.

### 6.2. JSAs' discharge from liability

It is proposed that the JSAs be discharged from liability on application to the Court.

# APPENDIX A

## STATUTORY INFORMATION

### Information

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Name	Wealthtek Limited Liability Partnership
Trading name(s)	WealthTek, Vertem Asset Management and Malloch Melville
Partnership registration number	OC355200
Registered office	c/o BDO LLP, 5 Temple Square, Temple Street, Liverpool L2 5RH
Designated members	John Edward Dance WealthTek Capital Limited
Court name and reference	High Court of Justice, Business and Property Courts of England and Wales court reference CR-2023-001772
Date of appointment	6 April 2023
Appointor	The High Court of Justice, Business and Property Courts of England & Wales, on application by the FCA
JSAs	Shane Crooks, Kirsty McMahon and Emma Sayers

Under the provisions of paragraph 100(2) of Schedule B1 to the Act (as applied by regulation 15 of the Regulations), the JSAs carry out their functions jointly and severally meaning any action can be done by one Special Administrator or by all of them.

JSAs' address	BDO LLP, 55 Baker Street, London W1U 7EU
Data Control and GDPR	Shane Crooks, Kirsty McMahon and Emma Sayers are authorised to act as Insolvency Practitioners by the Institute of Chartered Accountants in England and Wales in the UK. The Joint Special Administrators are Data Controllers as defined by the UK General Data Protection Regulation (albeit this does not extend to personal data processed by the LLP prior to the Special Administration). BDO LLP will act as Data Processor on the instruction of the Data Controllers. Personal data will be kept secure and processed only for matters relating to the Special Administration of Wealthtek Limited Liability Partnership. Please see the privacy statement at <a href="https://www.bdo.co.uk/en-gb/privacy-notice/insolvencies">https://www.bdo.co.uk/en-gb/privacy-notice/insolvencies</a>

## APPENDIX B

### CLIENTS' AND CREDITORS' RIGHTS

Within 21 days of receipt of the report: (1) a Secured Creditor; (2) an Unsecured Creditor with the concurrence of at least 5% in value (including the creditor in question) of the Unsecured Creditors; (3) a Client with the concurrence of Clients claiming for at least 5% in value of the Client Assets (including the Client in question); or (4) any Unsecured Creditor applying within such period, with the permission of the Court, may request in writing that the JSAs provide further information about their remuneration or expenses which are itemised in the Report (other than pre-Special Administration costs).

Within 14 days of receipt of the request, the JSAs must provide all of the information asked for, unless they think that:

- the time or cost in preparing the information would be excessive;
- disclosure of the information would be prejudicial to the conduct of the Special Administration or might reasonably be expected to lead to violence against any person; or
- the JSAs are subject to confidentiality obligations in respect of the information.

The JSAs must give reasons for not providing all of the requested information.

The following persons: (1) any Secured Creditor; (2) any Unsecured Creditor with either the concurrence of at least 10% in value of the Unsecured Creditors or the permission of the Court; (3) any Client with the concurrence of Clients representing at least 10% of the total claims in respect of Client Assets held by the LLP or with the permission of the Court; or (4) the FCA, may, within eight weeks of receipt of the Report, make an application to Court that the basis fixed for the JSAs' remuneration, the remuneration charged, or the expenses incurred by the JSAs, as set out in the Report, are excessive (or, in the case of the basis fixed, inappropriate).

Copies of BDO LLP's charging and expenses policy, 'A Creditors' Guide to Special Administrators' Fees' and information on the rights, duties and functions of a creditors' committee are available at <https://www.bdo.co.uk/en-gb/insights/advisory/business-restructuring/creditors-guides>.

Please note this guidance relates to insolvency processes under the Insolvency Act 1986, rather than the Regulations, but the contents remain relevant for these purposes.

The Insolvency Service has established a central gateway for considering complaints in respect of Insolvency Practitioners. In the event that you make a complaint to us but are not satisfied with the response, then you should visit <https://www.gov.uk/complain-about-insolvency-practitioner> where you will find further information on how you may pursue the complaint.

The JSAs are bound by the Insolvency Code of Ethics when carrying out all professional work relating to this Special Administration. A copy of the code can be found at <https://www.icaew.com/technical/ethics/icaew-code-of-ethics/icaew-code-of-ethics>.

# APPENDIX C

## RECEIPTS AND PAYMENTS ACCOUNTS

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Objective One Receipts & Payments Account**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>OBJECTIVE ONE RECEIPTS</b>		
Repayable Loan Facility	NIL	950,000.00
FSCS Costs Contribution (from Segregated Trust Account)	2,801,153.94	12,071,460.45
Interest Gross <sup>(1)</sup>	2,605.43	12,048.12
Interest from Segregated Trust Account	44,464.09	44,464.09
Client Costs Contributions	60,576.00	60,576.00
	2,908,799.46	13,138,548.66
<b>OBJECTIVE ONE PAYMENTS</b>		
WealthTek Nominees Limited - Fees	291,076.41	291,076.41
Principal Loan Repayment	NIL	950,000.00
Initial Arrangement Fee	NIL	60,000.00
Additional Arrangement Fee	NIL	220,000.00
Interest	NIL	172,383.57
Lender Legal Fees	NIL	9,903.00
Bank charges	NIL	3,381.39
Wages	NIL	471,039.73
PAYE/NIC	133.76	321,752.83
Pension Contributions	174.10	7,981.52
Membership Fees	NIL	779.00
Re-direction of Mail	NIL	6,248.00
Consultancy Fees - IT Platform	NIL	763,921.44
Software Licences	815.10	19,770.69
Agents' Fees - Payroll	NIL	5,714.09
Agent's Fees - Employment Consultants	NIL	440.00
Appointment Fee - WealthTek Nominees Limited	NIL	9,029.00
Legal Fees and Expenses	861,336.78	2,924,813.45
Travel & Accommodation	NIL	2,739.35
Books & Records Collection & Storage	200.10	3,431.70
Telephones	244.67	2,285.61
Statutory Advertising	NIL	4,414.08
Initial Meeting Room Hire	NIL	2,445.84
Printing & Postage	NIL	1,760.00
Website/Hosting Fees	NIL	940.10
Joint Special Administrators' Fees	2,115,030.21	5,019,011.65
Insurance costs	NIL	3,791.20
Non-recoverable VAT (Objective One)	653,740.65	1,809,611.93
Share Certificate stamp duty <sup>(2)</sup>	NIL	3,718.74
	(3,922,751.78)	(13,092,384.32)

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<b>BALANCE IN HAND</b>	<b>46,164.34</b>
<b>REPRESENTED BY</b>	
Objective 1 account	<b>46,164.34</b>

*Notes*

- 1 The interest gross amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £38. This amount was received in the previous period but was not accounted for until after 5 October 2025.*
  - 2 The initial share certificate stamp duty was paid from the Objective 1 account; however, as this constitutes a Client Money expense, the account will be reimbursed from the Client Money estate in due course.*
-

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Segregated Trust Receipts & Payments Account**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>SEGREGATED TRUST RECEIPTS</b>		
Funds from FSCS	NIL	32,549,044.52
Client Costs Contributions	15,135.00	60,576.00
Interest Gross <sup>(1)</sup>	9,846.25	45,421.05
Segregated Funds (to Post-App Receipts Account) <sup>(2)</sup>	NIL	12,610.48
	<u>24,981.25</u>	<u>32,667,652.05</u>
<b>SEGREGATED TRUST PAYMENTS</b>		
FSCS Cost Contribution (to Objective 1 Account)	2,801,153.94	12,071,460.45
Interest Gross (to Objective 1 Account)	44,464.09	44,464.09
Client Costs Contribution (to Objective 1 Account)	60,576.00	60,576.00
FSCS Shortfall Payments	NIL	20,477,584.07
Segregated Funds (to Post-App Receipts Account) <sup>(2)</sup>	12,610.48	12,610.48
	<u>(2,918,804.51)</u>	<u>(32,666,695.09)</u>
<b>BALANCE IN HAND</b>		<b><u>956.96</u></b>
<b>REPRESENTED BY</b>		
Segregated Trust Account		<b><u>956.96</u></b>

*Notes*

- 1 *The interest gross amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £1,713. This amount was received in the previous period but was not accounted for until after 5 October 2025.*
- 2 *These funds were previously held in the Segregated Trust account and were transferred to the Post-Appointment Receipts Account for subsequent release in the Period.*

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' FSCS Shortfall Payments Receipts & Payments Account**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>FSCS SHORTFALL RECEIPTS</b>		
Funds from FSCS	NIL	20,477,584.07
Interest Gross <sup>(1)</sup>	3,051.76	88,197.80
	3,051.76	20,565,781.87
<b>FSCS SHORTFALL PAYMENTS</b>		
Shortfall payments	646,115.23	20,367,525.05
Bank charges	NIL	30.00
	(646,115.23)	(20,367,555.05)
<b>BALANCE IN HAND</b>		<b><u>198,226.82</u></b>
<b>REPRESENTED BY</b>		
Costs Contribution Drawdown Reserve		<b><u>198,226.82</u></b>

*Notes*

- 1 The interest gross amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £1,173. This amount was received in the previous period but was not accounted for until after 5 October 2025.

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**  
**Joint Special Administrators' Client Monies Receipts & Payments Account**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>CLIENT MONIES RECEIPTS</b>		
Monies from CACEIS held at PPE	NIL	2,467,354.91
Monies from Barclays held at PPE	NIL	202,602.66
Share Certificate Proceeds <sup>(1)</sup>	79,206.65	198,820.22
Surplus Assets proceeds	2,507,120.39	2,689,637.90
Interest Gross <sup>(2)</sup>	15,321.78	44,876.22
	2,601,648.82	5,603,291.91
<b>CLIENT MONIES PAYMENTS</b>		
Legal Fees & Expenses	13,965.00	54,316.50
Joint Special Administrators' Fees	228,737.43	526,693.39
Non-recoverable VAT	48,540.48	116,201.97
Client cost contribution	11,906.90	31,033.71
Distribution to Clients	118,279.24	2,063,091.03
Insurance costs	3,791.20	3,791.20
Bank charges	0.50	45.50
Share Certificate stamp duty	4,466.06	4,466.06
	(429,686.81)	(2,799,639.36)
<b>BALANCE IN HAND</b>		<b>2,803,652.55</b>
<b>REPRESENTED BY</b>		
Client Monies (Held at PPE) Account		384,415.67
Client Monies Account		2,419,236.88
		<b>2,803,652.55</b>

**Notes**

- 1 "Share certificate dividends" has been renamed "share certificate proceeds" to accurately reflect that it comprises both dividends and sale proceeds. In addition, the total amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £35,185. This amount was received in the previous period but was not accounted for until after 5 October 2025.

- 2 *The interest gross amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £2,438. This amount was received in the previous period but was not accounted for until after 5 October 2025.*
-

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Post-Appointment Corporate Action Receipts & Payments Account GBP**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>POST-APPOINTMENT CORPORATE ACTION RECEIPTS</b>		
Post-appointment Receipts <sup>(1)(2)</sup>	1,138,525.45	14,998,562.26
Interest Gross <sup>(3)</sup>	7,089.90	21,544.02
	<u>1,145,615.35</u>	<u>15,020,106.28</u>
<b>POST-APPOINTMENT CORPORATE ACTION PAYMENTS</b>		
Distributions to Clients	1,314,209.71	14,401,881.00
Client cost contribution	3,228.10	25,459.49
Bank charges	51.00	96.00
Ringfenced funds	(12,610.48)	NIL
	<u>(1,304,878.33)</u>	<u>(14,427,436.49)</u>
<b>BALANCE IN HAND</b>		<u><u>592,669.79</u></u>
<b>REPRESENTED BY</b>		
Post-appointment monies held		<u><u>592,669.79</u></u>

*Notes*

- 1 *The post-appointment receipts reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £132,320. This amount was received in the previous period but was not accounted for until after 5 October 2025.*
- 2 *Please note, the payments shown above exclude the payment of liquidation proceeds, for clients that opted to liquidate their assets. The payment of liquidation proceeds is presented in the JSAs' GBP Liquidation Proceeds Receipts and Payments Account below. The post-appointment receipts reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was £23,602,914 of which £9,875,197 related to liquidation proceeds.*
- 3 *The interest gross amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £3,233. This amount was received in the previous period but was not accounted for until after 5 October 2025.*

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Post-Appointment Corporate Action Receipts & Payments Account EUR**

	From 06/10/2025 To 05/04/2026 EUR €	From 06/04/2023 To 05/04/2026 EUR €
<b>POST-APPOINTMENT CORPORATE ACTION RECEIPTS</b>		
Post-appointment Receipts <sup>(1)</sup>	NIL	280,832.68
Funds advanced for bank charges <sup>(2)</sup>	NIL	778.64
	NIL	281,611.32
<b>POST-APPOINTMENT CORPORATE ACTION PAYMENTS</b>		
Distributions to Clients	NIL	280,930.91
Bank Charges	NIL	540.45
	NIL	(281,471.36)
<b>BALANCE IN HAND</b>		<b>139.96</b>
<b>REPRESENTED BY</b>		
Post-appointment monies held		<b>139.96</b>

*Notes*

- 1 Please note, the payments shown above exclude the payment of liquidation proceeds, for clients that opted to liquidate their assets. The payment of liquidation proceeds is presented in the JSAs' EUR Liquidation Proceeds Receipts and Payments Account below. The post-appointment receipts reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was £304,378 of which £23,545 related to liquidation proceeds.
- 2 Funds advanced for bank charges were transferred from an account maintained by the JSAs for the purpose of settling Objective One costs ('the Objective One Account') to cover bank charges applied on foreign currency transfers. Once all transfers are complete, any balance held will be refunded to the Objective One Account.

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Post-Appointment Corporate Action Receipts & Payments Account USD**

	From 06/10/2025 To 05/04/2026 USD \$	From 06/04/2023 To 05/04/2026 USD \$
<b>POST-APPOINTMENT CORPORATE ACTION RECEIPTS</b>		
Post-appointment Receipts <sup>(1)</sup>	1,039,241.63	2,577,745.40
Funds advanced for bank charges <sup>(2)</sup>	NIL	725.40
	<u>1,039,241.63</u>	<u>2,578,470.80</u>
<b>POST-APPOINTMENT CORPORATE ACTION PAYMENTS</b>		
Distributions to Clients	1,019,278.12	2,557,826.34
Bank Charges	NIL	458.10
	<u>(1,019,278.12)</u>	<u>(2,558,284.44)</u>
<b>BALANCE IN HAND</b>		<u><u>20,186.36</u></u>
<b>REPRESENTED BY</b>		
Post-appointment monies held		<u><u>20,186.36</u></u>

*Notes*

- 1 Please note, the payments shown above exclude the payment of liquidation proceeds, for clients that opted to liquidate their assets. The payment of liquidation proceeds is presented in the JSAs' USD Liquidation Proceeds Receipts and Payments Account below. The post-appointment receipts reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was £1,579,007 of which £40,503 related to liquidation proceeds.
- 2 Funds advanced for bank charges were transferred from the Objective One Account to cover bank charges applied on foreign currency transfers. Once all transfers are complete, any balance held will be refunded to the Objective One Account.

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Post-Appointment Corporate Action Receipts & Payments Account AUD**

	From 06/10/2025 To 05/04/2026 AUD \$	From 06/04/2023 To 05/04/2026 AUD \$
<b>POST-APPOINTMENT CORPORATE ACTION RECEIPTS</b>		
Post-appointment Receipts <sup>(1)</sup>	NIL	3,722.83
Funds advanced for bank charges <sup>(2)</sup>	NIL	1,114.40
	NIL	4,837.23
<b>POST-APPOINTMENT CORPORATE ACTION PAYMENTS</b>		
Distributions to Clients	NIL	3,821.40
Bank Charges	NIL	189.99
	NIL	(4,011.39)
<b>BALANCE IN HAND</b>		<b>825.84</b>
<b>REPRESENTED BY</b>		
Post-appointment monies held		<b>825.84</b>

*Notes*

- Please note, the payments shown above exclude the payment of liquidation proceeds, for clients that opted to liquidate their assets. The payment of liquidation proceeds is presented in the JSAS' AUD Liquidation Proceeds Receipts and Payments Account below. The post-appointment receipts reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was £20,373 of which £16,651 related to liquidation proceeds.*
- Funds advanced for bank charges were transferred from the Objective One Account to cover bank charges applied on foreign currency transfers. Once all transfers are complete, any balance held will be refunded to the Objective One Account.*

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Post-Appointment Corporate Action Receipts & Payments Account CAD**

	From 06/10/2025 To 05/04/2026 CAD \$	From 06/04/2023 To 05/04/2026 CAD \$
<b>POST-APPOINTMENT CORPORATE ACTION RECEIPTS</b>		
Post-appointment Receipts	NIL	13,034.21
Funds advanced for bank charges <sup>(1)</sup>	NIL	937.85
	NIL	13,972.06
<b>POST-APPOINTMENT CORPORATE ACTION PAYMENTS</b>		
Distributions to Clients	NIL	13,034.21
Bank Charges	NIL	110.79
	NIL	(13,145.00)
<b>BALANCE IN HAND</b>		<b>827.06</b>
<b>REPRESENTED BY</b>		
Post-appointment monies held		<b>827.06</b>

*Notes*

- <sup>1</sup> Funds advanced for bank charges were transferred from the Objective One Account to cover bank charges applied on foreign currency transfers. Once all transfers are complete, any balance held will be refunded to the Objective One account.

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Liquidation Proceeds Receipts & Payments Account GBP**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>LIQUIDATION PROCEEDS</b>		
Liquidation proceeds	498,238.52	10,373,435.57
	498,238.52	10,371,330.31
<b>LIQUIDATION PAYMENTS</b>		
Distributions to Clients	498,238.52	10,371,330.31
	(498,238.52)	(10,371,330.31)
<b>BALANCE IN HAND</b>		<b>2,105.26</b>
<b>REPRESENTED BY</b>		
Liquidation proceeds held		<b>2,105.26</b>

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Liquidation Proceeds Receipts & Payments Account EUR**

	From 06/10/2025 To 05/04/2026 EUR €	From 06/04/2023 To 05/04/2026 EUR €
<b>LIQUIDATION PROCEEDS</b>		
Liquidation proceeds	NIL	23,545.19
	NIL	23,545.19
<b>LIQUIDATION PAYMENTS</b>		
Distributions to Clients	NIL	23,545.19
	NIL	(23,545.19)
<b>BALANCE IN HAND</b>		-
<b>REPRESENTED BY</b>		
Liquidation proceeds held		-

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Liquidation Proceeds Receipts & Payments Account USD**

	From 06/10/2025 To 05/04/2026 USD \$	From 06/04/2023 To 05/04/2026 USD \$
<b>LIQUIDATION PROCEEDS</b>		
Liquidation proceeds	1,878,929.78	1,919,433.05
	1,878,929.78	1,919,433.05
<b>LIQUIDATION PAYMENTS</b>		
Distributions to Clients	1,878,929.78	1,919,433.05
	(1,878,929.78)	(1,919,433.05)
<b>BALANCE IN HAND</b>		-
<b>REPRESENTED BY</b>		
Liquidation proceeds held		-

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Liquidation Proceeds Receipts & Payments Account AUD**

	From 06/10/2025 To 05/04/2026 AUD \$	From 06/04/2023 To 05/04/2026 AUD \$
<b>LIQUIDATION PROCEEDS</b>		
Liquidation proceeds	NIL	16,650.55
	NIL	16,650.55
<b>LIQUIDATION PAYMENTS</b>		
Distributions to Clients	NIL	16,650.55
	NIL	(16,650.55)
<b>BALANCE IN HAND</b>		-
<b>REPRESENTED BY</b>		
Liquidation proceeds held		-

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Barclays Voluntary Payment Receipts & Payments Account**

	From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
<b>RECOVERIES PROCEEDS RECEIPTS</b>		
Barclays Voluntary Payment	NIL	6,281,757.00
Interest Gross	17,986.61	33,816.05
	17,986.61	6,315,573.05
<b>RECOVERIES PROCEEDS PAYMENTS</b>		
Distributions to Clients	85,720.47	4,121,999.71
	(85,720.47)	(4,121,999.71)
<b>BALANCE IN HAND</b>		<b>2,193,573.34</b>
<b>REPRESENTED BY</b>		
Recoveries Proceeds account		<b>2,193,573.34</b>

**Wealthtek Limited Liability Partnership**  
**Trading As: WealthTek, Vertem Asset Management and Malloch Melville**  
**(In Investment Bank Special Administration)**

**Joint Special Administrators' Estate Receipts & Payments Account**

Estimated to realise £		From 06/10/2025 To 05/04/2026 £	From 06/04/2023 To 05/04/2026 £
	<b>ASSET REALISATIONS</b>		
36,947.00	Book Debts	NIL	34,500.00
65,724.00	Cash at Bank	NIL	66,443.42
20,770.00	Refund of Rent Deposit	NIL	51,921.39
	Interest Gross <sup>(1)</sup>	1,143.58	7,448.63
		<u>1,143.58</u>	<u>160,313.44</u>
	<b>COST OF REALISATIONS</b>		
	Agents' Fees - Employment Consultants	NIL	1,595.00
	Agents' Fees & Expenses - Property	NIL	2,799.32
	Data Protection Fee	NIL	132.00
	Statutory Advertising	NIL	95.00
	Non-recoverable VAT	9,868.00	10,765.86
	Insurance costs	364.00	364.00
	Legal Fees and Expenses	49,340.00	49,340.00
		<u>(59,572.00)</u>	<u>(65,091.18)</u>
	<b>BALANCE IN HAND</b>		<u><u>95,222.26</u></u>
	<b>REPRESENTED BY</b>		
	Estate current account		<u><u>95,222.26</u></u>

*Notes*

- 1 The interest gross amount reported in the JSAs' previous progress report (covering the period from 6 April 2023 to 5 October 2025) was understated by £43. This amount was received in the previous period but was not accounted for until after 5 October 2025.

# APPENDIX D

## SPECIAL ADMINISTRATION REMUNERATION

### Joint Special Administrators' Time Costs

Time costs of £1,077,225.94 have been incurred during the Period and a breakdown is provided below, together with details of the work undertaken.

Activity	Partner	Director	Senior Manager	Manager	Senior Executive	Executive	Total hours	Time costs £	Av. Rate £
<b>Objective 1</b>									
<b>Client Assets</b>									
Steps on appointment	-	-	-	-	-	-	-	-	-
Planning and strategy	-	21.67	6.85	4.68	-	0.80	34.00	19,632.17	577.42
General administration	-	3.40	1.30	11.15	90.50	96.70	203.05	28,907.58	142.37
Taxation	-	-	-	0.45	-	-	0.45	176.09	391.30
Assets	-	-	-	-	-	-	-	-	-
Communications with clients	0.50	0.10	0.15	2.70	-	-	3.45	1,584.52	459.28
Securing Client Assets	1.75	11.30	100.60	171.30	-	24.65	309.60	133,640.57	431.66
Reconciliation of Client Assets	0.75	0.05	1.20	-	-	18.30	20.30	3,889.34	191.59
Liaising with lawyers and regulatory bodies	15.05	33.65	9.50	5.05	-	0.50	63.75	41,078.14	644.36
FCA investigation assistance	26.80	33.65	35.30	36.35	0.50	6.00	138.60	65,602.11	473.32
Funding	-	-	-	-	-	-	-	-	-
Investigations	12.70	27.75	5.25	0.25	4.15	-	50.10	34,978.72	698.18
Dealing with Recoveries Proceeds <sup>1</sup>	69.55	6.10	27.90	5.75	-	-	109.30	75,664.44	692.26
Preparation for and distributing client assets	34.20	186.85	523.25	163.65	4.40	93.90	1,006.25	530,037.27	526.75
Statutory reporting and decisions	-	-	-	-	-	-	-	-	-
Employees and pensions	-	-	-	-	-	-	-	-	-
Trading	-	-	-	-	-	-	-	-	-
Clients' and Creditors' Committee	0.40	0.48	0.08	1.80	-	-	2.76	1,323.53	479.54
<b>Total Objective 1</b>	<b>161.70</b>	<b>325.00</b>	<b>711.38</b>	<b>403.13</b>	<b>99.55</b>	<b>240.85</b>	<b>1,941.61</b>	<b>936,514.47</b>	<b>482.34</b>
<b>Objective 2</b>									
<b>Engagement with Regulatory Bodies</b>									
Financial Conduct Authority	7.05	6.35	0.75	1.40	-	-	15.55	10,438.75	671.30
Financial Services Compensation Scheme	3.90	-	-	-	-	-	3.90	2,989.35	766.50
London Stock Exchange	-	-	-	-	-	-	-	-	-
<b>Total Objective 2</b>	<b>10.95</b>	<b>6.35</b>	<b>0.75</b>	<b>1.40</b>	<b>-</b>	<b>-</b>	<b>19.45</b>	<b>13,428.10</b>	<b>690.39</b>
<b>Objective 3</b>									
<b>Estate</b>									
Steps on appointment	-	-	-	-	-	-	-	-	-
Planning and strategy	0.40	5.28	4.25	4.47	-	1.20	15.60	7,895.69	506.13
General administration	-	0.25	5.10	26.40	2.00	2.80	36.55	11,818.56	323.35
Assets	-	0.20	0.30	0.40	-	-	0.90	446.04	495.60
Investigations	-	-	-	1.75	-	-	1.75	684.78	391.30
Statutory reporting and decisions	4.40	10.40	37.85	28.30	-	1.65	82.60	41,319.01	500.23
Employees and pensions	-	6.20	0.30	3.15	-	-	9.65	5,381.92	557.71
Creditors	-	-	0.10	-	-	-	0.10	53.62	536.20
Post appointment taxation	1.75	32.55	-	61.40	-	29.10	124.80	59,352.90	475.58
Trading	-	-	-	-	-	-	-	-	-
Clients' and Creditors' Committee	0.10	0.12	0.02	0.45	-	-	0.69	330.88	479.54
<b>Total Objective 3</b>	<b>6.65</b>	<b>55.00</b>	<b>47.92</b>	<b>126.32</b>	<b>2.00</b>	<b>34.75</b>	<b>272.64</b>	<b>127,283.37</b>	<b>466.86</b>
<b>Grand total</b>	<b>179.30</b>	<b>386.35</b>	<b>760.05</b>	<b>530.85</b>	<b>101.55</b>	<b>275.60</b>	<b>2,233.70</b>	<b>1,077,225.94</b>	<b>482.26</b>

<sup>1</sup> During the Period, Objective One time costs totalling £75,664 were charged to the 'Recoveries Proceeds' workstream in the table above. These time costs relate to work undertaken in respect of the Barclays Voluntary Payment and the Sapia Voluntary Payment. Further work was undertaken in relation to the Barclays Voluntary Payment in the preceding period.

To date, total time costs of £155,075 have been incurred in dealing with the Recoveries Proceeds, against which we have received payments totalling £60,000 plus VAT from third parties, in accordance with the terms of the settlement agreement(s).

Total time costs of £10,181,737.55 have been incurred over the course of the Special Administration to 5 April 2026, as detailed below.

Activity	Partner	Director	Senior Manager	Manager	Senior Executive	Executive	Total hours	Time costs £	Av. Rate £
<b>Objective 1</b>									
<b>Client Assets</b>									
Steps on appointment	0.63	19.93	56.53	3.93	-	28.15	109.15	33,932.68	310.88
Planning and strategy	13.06	108.15	109.06	62.09	-	76.11	368.46	155,393.23	421.74
General administration	1.90	13.50	51.73	94.54	237.55	528.25	927.46	153,349.92	165.34
Taxation	-	2.25	-	7.35	-	0.25	9.85	4,234.76	429.92
Assets	-	0.75	-	4.70	-	4.58	10.03	2,383.26	237.73
Communications with clients	59.63	83.35	188.65	276.35	-	319.40	927.38	301,417.90	325.02
Securing Client Assets	5.25	11.30	104.80	173.90	-	32.50	327.75	140,399.81	428.37
Reconciliation of Client Assets	176.00	240.30	1,282.86	146.50	180.65	788.70	2,815.01	1,147,185.02	407.52
Liaising with lawyers and regulatory bodies	276.90	142.35	140.93	133.48	-	32.05	725.70	408,268.68	562.59
FCA investigation assistance	55.90	109.65	109.85	56.45	0.50	6.00	338.35	164,322.59	485.66
Funding	15.60	22.95	62.15	15.80	-	-	116.50	58,476.36	501.94
Investigations	91.25	292.85	546.60	220.60	21.65	247.60	1,420.55	640,917.41	451.18
Dealing with Recoveries Proceeds	98.40	6.10	110.55	38.10	-	2.45	255.60	155,074.89	606.71
Preparation for and distributing client assets	463.35	1,426.80	6,205.60	1,543.85	351.65	1,628.75	11,620.00	5,419,431.43	466.39
Statutory reporting and decisions	-	-	-	-	-	-	-	-	-
Employees and pensions	-	22.33	10.73	4.50	-	-	37.55	18,894.31	1,312.11
Trading	0.50	12.00	1.75	0.10	0.05	-	14.40	7,688.94	533.95
Clients' and Creditors' Committee	58.00	74.28	6.68	82.72	-	4.40	226.08	115,718.62	511.85
<b>Total Objective 1</b>	<b>1,316.36</b>	<b>2,588.83</b>	<b>8,988.45</b>	<b>2,864.94</b>	<b>792.05</b>	<b>3,699.18</b>	<b>20,249.81</b>	<b>8,927,089.79</b>	<b>440.85</b>
<b>Objective 2</b>									
<b>Engagement with Regulatory Bodies</b>									
Financial Conduct Authority	46.78	72.98	42.93	20.58	-	20.75	204.00	104,663.11	513.05
Financial Services Compensation Scheme	42.25	32.20	4.15	47.15	-	-	125.75	69,162.87	550.00
London Stock Exchange	1.25	2.00	-	-	-	-	3.25	1,885.80	580.25
<b>Total Objective 2</b>	<b>90.28</b>	<b>107.18</b>	<b>47.08</b>	<b>67.73</b>	<b>-</b>	<b>20.75</b>	<b>333.00</b>	<b>175,711.78</b>	<b>527.66</b>
<b>Objective 3</b>									
<b>Estate</b>									
Steps on appointment	0.63	19.48	23.13	5.53	-	30.70	79.45	24,346.32	306.44
Planning and strategy	3.69	32.90	38.90	28.92	-	26.80	131.20	52,835.80	402.73
General administration	6.15	14.30	28.08	94.02	33.10	157.60	333.24	73,111.31	219.40
Assets	0.25	33.25	13.40	5.45	0.20	4.13	56.68	27,040.02	477.11
Investigations	25.10	228.08	175.49	154.45	43.15	128.20	754.47	318,626.88	422.32
Statutory reporting and decisions	66.60	156.05	360.15	281.30	0.85	68.45	933.40	406,101.43	435.08
Employees and pensions	1.30	40.98	11.68	18.80	-	2.50	75.25	36,826.07	489.38
Creditors	-	1.10	4.80	11.35	-	11.25	28.50	6,718.67	235.74
Post appointment taxation	4.45	54.55	4.60	94.85	-	35.00	193.45	93,187.92	481.72
Trading	3.75	16.00	0.20	0.20	-	-	20.15	11,211.90	556.42
Clients' and Creditors' Committee	14.50	18.57	1.67	20.68	-	1.10	56.52	28,929.66	511.85
<b>Total Objective 3</b>	<b>126.42</b>	<b>615.25</b>	<b>662.08</b>	<b>715.54</b>	<b>77.30</b>	<b>465.72</b>	<b>2,662.30</b>	<b>1,078,935.98</b>	<b>405.27</b>
<b>Grand total</b>	<b>1,533.05</b>	<b>3,311.25</b>	<b>9,697.60</b>	<b>3,648.20</b>	<b>869.35</b>	<b>4,185.65</b>	<b>23,245.10</b>	<b>10,181,737.55</b>	<b>438.02</b>

The current charge out rates per hour of staff within BDO LLP who may be involved in working on the Special Administration are set out below. It was agreed with the FCA prior to the JSAs' appointment that the charge out rates applying to this assignment would be at a 30% discount to the JSAs' standard charge out rates at any point in time. The JSAs' discounted rates from 6 July 2025 are as follows:

Grade	Discounted Rate £
Partner	767 - 862
Director	482 - 796
Senior Manager	201 - 603
Manager	110 - 585
Senior Executive	118 - 331
Executive	72 - 307
BDO LLP tax department (max)	1,035

## Summary of the work undertaken by the JSAs during the Period

### Objective One: Client Assets

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#### Planning and strategy

- Routine review of case including review of progress against Objectives
- Monitoring and reviewing the return of Client Assets strategy, including internal and external meetings
- Regular internal strategy and planning meetings to ensure information is centralised and work progressed efficiently
- Preparation and review of strategy documents

#### General administration

- Administrative tasks in relation to hard copy letters received from Clients
- Ongoing maintenance and reconciliation of separate bank accounts dedicated to: (i) Objective One receipts and payments; (ii) receipts of pre-Special Administration Client Money; and (iii) receipts of Post-appointment Client Money
- Processing receipts and payments into and out of the above accounts. This includes both the payment of the Special Administration expenses and payments made to Clients and brokers in relation to the return of Client Assets
- Updating website notices
- Dealing with website domains

#### Taxation

- Dealing with employee PAYE and NIC matters
- Considering potential tax issues arising on income from, and the sale of, Surplus Assets

#### Communications with clients

- Updating and reviewing website notices
- Reviewing and dealing with incoming client correspondence

#### Securing Client Assets

- Facilitating the formal transfer and perfection of certificated shares to the LLP, including:
    - corresponding with Clients and issuing Clients with stock transfer forms to sign
    - engaging with share registrars
    - dealing with the stamp duty tax arising on the transfer of the share certificates
    - reviewing new share certificates received and updating the share certificate reconciliation
    - accounting for dividends received on physical share certificates
  - Engaging with share registrars in relation to the transfer and sale of Surplus Assets and the related withheld dividend income
-

### Reconciliation of Client Assets

- Monitoring and updating Client positions on the Client Assets Reconciliation
- Undertaking routine reconciliations on the Custody Assets held
- Undertaking daily reconciliations of pre-Special Administration Client Money and Post-appointment Client Money
- Monitoring and updating bank reconciliations
- Ongoing correspondence with Barclays and CACEIS

### Liaising with lawyers and regulatory bodies

- Engaging NRF in respect of all legal issues arising in the Special Administration. In particular, dealing with the irregularities identified with certain ISA accounts and routine advice connected with Client queries and the transfer of Client Assets
- Liaising with the FSCS regarding the assessment of cover, particular Client enquiries and drawdown requests under the Compensation Deed
- Liaising with the FSCS regarding outstanding eligibility queries

### FCA investigation assistance

- Liaising with the FCA in relation to its investigations connected to the criminal proceedings against Mr Dance
- Responding to information requests

### Investigations

- Undertaking investigations connected to third party information requests, including:
  - reviewing and analysing a significant number of historic transactions
  - updating the funds flow analysis
  - reviewing historic account specific transactions and movements
  - liaising with solicitors in relation to the enquiries made
  - liaising with third parties in relation to information requests

### Dealing with Recoveries Proceeds

- Liaising with the FCA regarding the Barclays Voluntary Payment
- Liaising with Clients regarding the Barclays Voluntary Payment and making payments to eligible Clients
- Liaising with the FCA, FSCS and Sapia (via its legal advisers) regarding the Sapia Voluntary Payment
- Drafting notifications and communications to Clients regarding the Sapia Voluntary Payment

### Preparing for and distributing Client Assets

- Liaising with NRF regarding the transfer of Client Assets and associated matters
  - Dealing with extensive enquiries received from Clients in relation to their Client Assets Statements, Client Assets Claim Forms and Client Assets Confirmation Statements
  - Liaising with HMRC on pre-June 2021 ISAs
-

- Engaging with the Nominated Broker and other alternative brokers in relation to the transfer and distribution of Client Assets pursuant to the Distribution Plan
- Extensive correspondence with the Nominated broker and various alternative brokers regarding the transfer of Client Assets, including the provision of account valuations and agreeing trade and settlement dates
- Instructing the LLP's custodian, CACEIS, in relation to the transfer of Client Assets to the Nominated Broker and various alternative brokers
- Issuing instructions to the various unit trust managers in relation to the transfer of Client Assets to the Nominated Broker and various alternative brokers
- Arranging the transfer of Client Money to the Nominated Broker and the various alternative brokers as part of the Client transfers.
- Issuing trade instructions and monitoring settlement of Client transfers.
- Issuing sale instructions to the LLP's custodian for the liquidation of Custody Assets.
- Issuing redemption instructions to unit trust managers for the liquidation of Custody Assets
- Monitoring and reconciling the proceeds of the sale of Custody Assets and preparing schedules for Clients detailing the sale proceeds
- Issuing notices to Clients in accordance with the Distribution Plan confirming their proposed Transfer/Distribution Instruction Date, providing updated CACS and liquidation schedules, where applicable
- Issuing Sweep Payments notices to Clients
- Liaising with the Nominated Broker and the various alternative brokers in relation to the payment of the Sweep Payments
- Dealing with Client queries in relation to the transfer of their Client Assets
- Dealing with Client queries in relation to FSCS compensation, eligibility and payment
- Regular internal meetings and discussions regarding the strategy for distributing Client Assets
- Engaging with the Platform provider, Contemi Solutions (London) Limited, in relation to the provision of services and related data access requirements

### **Clients' and Creditors' Committee**

- Liaising with the Committee in relation to certain ad hoc matters relating to the conduct of the administration

### **Client Money**

- Included in the above are time costs of £315,642.40 (represented by 670.49 hours at an average rate of 470.76 per hour) relating to work attributable to Client Money, including:
  - Undertaking ongoing reconciliations of pre-appointment and post-appointment Client Money accounts;
  - Monitoring and processing corporation actions in relation to Surplus Assets;
  - Engaging with the Nominated Broker and various Alternative Brokers in relation to the transfer and distribution of clients' accounts, including Client Money balances;
  - Preparing and issuing Transfer/Distribution Instruction Notices to clients notifying them of the Transfer/Distribution of their account(s), including Client Money;
  - Finalising the Surplus Assets holdings and engaging with Caceis to issue sale instructions;
  - Ongoing monitoring, review and reconciliation of the settlement of the liquidation of the Surplus Assets and further correspondence with Caceis in relation to problem assets/assets not readily saleable and resolving associated issues;

- Facilitating the formal transfer and perfection of certificated shares to WealthTek, including:
  - Corresponding with clients and issuing clients with stock transfer forms to sign;
  - Engaging with share registrars;
  - Dealing with the stamp duty tax arising on the transfer of the share certificates; and
  - Reviewing new share certificates received and further engagement with share registrars in relation to their sale;
- Considering tax implications in relation to income connected to, and sale of, the Surplus Assets, and liaising with NRF in relation to the same; and
- Preparing calculations for the second Client Money distribution.

## **Objective Two: Engagement with market infrastructure bodies and the Authorities**

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- Liaising with the FCA, including regular calls to discuss the progress of the Special Administration and dealing with ad hoc queries and issues
- Liaising with the FSCS, including regular calls to discuss the progress of the Special Administration and dealing with ad hoc queries and issues

## **Objective Three: Estate**

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### **Planning and strategy**

- Case reviews
- Internal strategy and planning meetings to review progress
- Preparation and review of strategy documents

### **General administration**

- Monitoring and reconciliation of the Special Administration bank account and other cashiering functions
- Arranging the renewals of the redirection of the LLP's mail
- Dealing with queries from various stakeholders
- Internal file reviews

### **Assets**

- Correspondence with insurers regarding coverage

### **Investigations**

- Liaising with third parties concerning the LLP's affairs

### **Statutory reporting and decisions**

- Preparation of the 30-month progress report
  - Preparation of a remuneration report for the approval of the JSAs' Objective One remuneration and expenses for the period 6 April 2024 to 5 April 2025
  - Preparing for the drafting of this Report
-

**Employees and pensions**

- Dealing with reference requests received in relation to the retained employees
- Investigating pension related enquiries concerning the retained employees

**Creditors**

- Correspondence with local authorities regarding potential claims

**Post-appointment taxation**

- Considering and making enquiries in relation to the LLP's VAT position to ascertain whether any VAT payable on costs and expenses of the Special Administration can be recovered by the JSAs
- Reviewing Corporation Tax position/returns and discussing with an internal tax specialist

**Committee**

- Liaison with Committee on non-Objective One issues
  - Monitoring Committee positions following the return of Client Assets
-

# Appendix E

## JOINT SPECIAL ADMINISTRATORS' EXPENSES

Category 1 expenses are expenses relating directly to the case incurred by an independent third party. In addition to professional fees and expenses, other expenses may include items such as bonding, advertising, insurance, external printing costs, couriers, travel, land registry searches, fees in respect of swearing legal documents and storage of the LLP's records. Printing and postage of circulars may be sub-contracted to external printers who have the capacity to deal with large circulars to a volume of creditors in a timely manner. Client/Creditor approval is not required to pay these expenses which will be charged to the case at cost.

Category 2 expenses are expenses that have been incurred by an associated party or which have an element of shared costs. Client/Creditor approval is required to pay category 2 expenses.

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The JSAs' expenses incurred and paid (excluding VAT), in relation to Objective One, are detailed below.

Objective One Expenses	Incurred 06/10/2025 to 05/04/2026 (£)	Total Incurred 06/04/2023 to 05/04/2026 (£)	Total Paid 06/04/2023 to 05/04/2026 (£)
<b>Category 1</b>			
Agents' Fees - Payroll	-	5,714.09	5,714.09
Agents' Fees - Employment Consultants	-	440.00	440.00
Appointment Fee - WealthTek Nominees Limited	-	9,029.00	9,029.00
Bank Charges	-	3,381.39	3,381.39
Books & Records Collection & Storage <sup>1</sup>	200.10	3,431.70	3,431.70
Consultancy Fees - IT Platform	-	763,921.44	763,921.44
Design & Publication	-	2,079.00	-
Funding - Initial Arrangement Fee	-	60,000.00	60,000.00
Funding - Additional Arrangement Fee	-	220,000.00	220,000.00
Funding - Interest Incurred	-	172,383.57	172,383.57
Funding - Funder Costs (including Legal fees)	-	9,903.00	9,903.00
Initial Meeting Room Hire	-	2,445.84	2,445.84
IT Equipment	-	547.55	-
Insurance costs <sup>2</sup>	-	3,791.20	3,791.20
Legal Fees and Expenses <sup>3</sup>	272,615.40	3,515,847.38	2,924,813.45
Membership Fees	-	779.00	779.00
PAYE/NIC <sup>4</sup>	133.76	321,752.83	321,752.83
Pension Contributions <sup>4</sup>	174.10	7,981.52	7,981.52
Printing & Postage	-	1,760.00	1,760.00
Re-direction of Mail	-	6,248.00	6,248.00
Software Licences	815.10	19,770.69	19,770.69
Statutory Advertising	-	4,414.08	4,414.08
Subsistence	-	352.76	-
Telephones	244.67	2,285.61	2,285.61
Travel & Accommodation	-	9,621.15	2,739.35
Wages	-	471,039.73	471,039.73
Website/hosting Fees	-	940.10	940.10
Search fees	-	19.14	-
<b>Category 2</b>			
Mileage	-	453.90	-
Software Licences and Data Hosting Fees <sup>5</sup>	33,333.32	191,934.84	-
<b>Total</b>	<b>307,063.16</b>	<b>5,812,783.51</b>	<b>5,019,016.59</b>

1. D.Collard Limited (t/a Quicksilver) were previously instructed to store the LLP's hard copy records. As previously reported, the LLP's hard copy records were delivered to the JSAs' offices for further review and cataloguing. The records were then collected and stored by Total Data Management Limited. D.Collard Limited and Total Data Management Limited are both specialist storage firms.
2. The JSAs obtained insurance to cover the return of certificated shares. If any share certificates are lost in transit, this insurance will cover the cost to replace the share certificate.

3. NRF continued to be instructed throughout the Period to advise the JSAs on the various matters arising in the Special Administration. NRF was selected due to its relevant knowledge and expertise. Included within this sum are amounts due to counsel.
4. PAYE/NIC and Pension scheme contributions of £134 and £174 respectively were paid in the Period in settlement of outstanding amounts relating to the formerly retained employees.
5. During the Period, the JSAs incurred fees in relation to software and data hosting services supplied to BDO LLP by Relativity. The cost incurred relates solely to the processing and hosting of the LLP's data. Relativity was selected due to its suitability for the JSAs' requirements in relation to data hosting and investigations.

The other expenses shown are self-explanatory.

The JSAs' expenses incurred and paid (excluding VAT), in relation to the Estate, are detailed below.

Estate Expenses	Incurred 06/10/2025 to 05/04/2026 (£)	Total Incurred 06/04/2023 to 05/04/2026 (£)	Total Paid 06/04/2023 to 05/04/2026 (£)
<b>Category 1</b>			
Agents' Fees & Expenses - Employment Consultants	-	1,595.00	1,595.00
Agents' Fees & Expenses - Property	-	2,799.32	2,799.32
Data Protection Fee	-	132.00	132.00
Land Registry Fees	14.00	159.00	-
Insurance costs	364.00	364.00	364.00
Legal Fees and Expenses <sup>1</sup>	23,354.50	676,789.80	49,340.00
Specific Penalty Bond	-	200.01	-
Statutory Advertising	-	194.00	95.00
<b>Total</b>	<b>23,732.50</b>	<b>682,233.13</b>	<b>54,325.32</b>

1. NRF continued to be instructed throughout the period to advise the JSAs on various matters arising in the Special Administration. NRF was selected due to its relevant knowledge and expertise. Included within this sum are amounts due to counsel.

# Appendix F

## CREDITOR CLAIM FORM

# PROOF OF DEBT FORM

Wealthtek Limited Liability Partnership trading as: WealthTek, Vertem Asset Management and Malloch Melville - In Investment Bank Special Administration  
Partnership registration number: OC355200  
Date the Limited Liability Partnership entered Special Administration: 6 April 2023

Name of Creditor <i>(If a company please also give company registration number and where registered)</i>	
Address of Creditor <i>including email address for correspondence</i>	
Total amount of claim, including any Value Added Tax and outstanding uncapitalised interest as at the date the Limited Liability Partnership entered Special Administration. <i>Note: Any trade or other discounts (except discount for immediate or early settlement) which would have been available to the Limited Liability Partnership but for the insolvency proceedings should be deducted from the above claim where relevant. Where any payment is made in relation to the claim or set-off applied after date of Special Administration, this should be deducted.</i>	£
If amount in 3 above includes outstanding uncapitalised interest please state amount.	£
Particulars of how and when debt incurred <i>(If you need more space append a continuation sheet to this form).</i>	
Particulars of any security held, the value of the security, and the date it was given.	
Particulars of any reservation of title claimed in respect of goods supplied to which the claim relates.	
Details of attached documents by reference to which the debt can be substantiated.	
Signature of creditor or person authorised to act on his behalf	
Name (BLOCK CAPITALS)	
Dated	
Position with or in relation to creditor	
Address of person signing <i>(if different from 2 above)</i>	

Please complete and return this form to WealthTek Team, Business Restructuring, BDO LLP, 5 Temple Square, Temple Street, Liverpool L2 5RH or by email to [WealthTekClients@bdo.co.uk](mailto:WealthTekClients@bdo.co.uk)

## Appendix G

### FEES AND EXPENSES FOR WHICH APPROVAL IS BEING SOUGHT

The JSAs' are seeking approval of their Objective One remuneration attributable to Client Money incurred in the third year of the Special Administration (i.e. the period from 6 April 2025 to 5 April 2026) in the sum of £315,642.40 plus VAT (represented by 670 hours of work at an average rate of c£471 per hour).

The work in relation to Client Money in the third year of the Special Administration includes but is not limited to:

- Undertaking ongoing reconciliations of pre-appointment and post-appointment Client Money accounts;
- Monitoring and processing corporation actions in relation to Surplus Assets;
- Engaging with the Nominated Broker and various Alternative Brokers in relation to the transfer and distribution of clients' accounts, including Client Money balances;
- Preparing and issuing Transfer/Distribution Instruction Notices to clients notifying them of the Transfer/Distribution of their account(s), including Client Money;
- Finalising the Surplus Assets holdings and engaging with CACEIS and the various Unit Trust managers to issue sale instructions;
- Ongoing monitoring, review and reconciliation of the settlement of the liquidation of the Surplus Assets and further correspondence with CACEIS and the Unit Trust managers in relation to problem assets/assets not readily saleable and resolving associated issues;
- Facilitating the formal transfer and perfection of certificated shares to WealthTek LLP, including:
  - Corresponding with clients and issuing clients with stock transfer forms to sign;
  - Engaging with share registrars;
  - Dealing with the stamp duty tax arising on the transfer of the share certificates;
  - Reviewing new share certificates received and further engagement with share registrars in relation to their sale;
  - Considering tax implications in relation to income connected to, and sale of, the Surplus Assets;
  - Liaising with NRF in relation to potential tax implications arising on the income connected to, and sale of, the Surplus Assets;
- Preparing calculations for the second Client Money distribution.

#### WealthTek Nominees Limited

In addition to the above, there is a funding agreement between the LLP and WT Nominees, on the basis that the work undertaken in the liquidation of WT Nominees is for the direct benefit of the LLP's Clients. A number of the unit trust assets held by WT Nominees were Surplus Assets which have now been realised for the benefit of the CMP. The element of time costs incurred in dealing with these assets is attributable to the CMP.

The general body of Clients has previously approved the time costs incurred in the liquidation of WT Nominees in the period from 5 September 2024 (date of appointment of liquidators) to 5 May 2025 in the sum of c£499k plus VAT. Time spent in the liquidation relating to Client Money (this being time spent dealing with the Surplus Assets up to 31 May 2025, when the Surplus Assets were sold) is £67,511.30. Whilst most of this sum was included in the time costs agreed by the general body of Clients as noted above, additional costs accrued in the month of May 2025. None of the costs attributable to Client Money have yet been drawn.

For the sake of good order, we are therefore seeking approval of the costs incurred in WT Nominees attributable to Client Money, in the sum of £67,511.30 plus VAT, to be paid out of the Client Money held by the LLP.

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# Appendix H

## NOTICE OF WRITTEN RESOLUTION - RULE 97

Wealthtek Limited Liability Partnership ('the LLP') - In Investment Bank Special Administration  
High Court of Justice No. CR-2023-001772  
Registered office: BDO LLP, 5 Temple Square, Liverpool L2 5RH  
Company registration number: OC355200

**NOTICE IS GIVEN** that I am proposing that the following resolutions ('the Proposed Resolutions') be considered by Clients of the LLP by a written resolution by notice procedure:

1. The amount of the JSAs' remuneration to be paid out of the Client Money held in accordance with CASS 7.17.2R within the Client Assets Sourcebook (as amended from time to time) published by the FCA as part of the FCA Handbook in respect of costs properly attributable to the distribution of Client Money incurred in pursuit of Objective One in the Special Administration ('Client Money Remuneration'), for the period 6 April 2025 to 5 April 2026, be and is hereby approved in the sum of £315,642.40 (excluding VAT)
2. The JSAs be and are hereby authorised by the LLP's Clients to arrange for payment of the Client Money Remuneration out of the Client Money held by the LLP
3. The JSAs be and are hereby authorised by the LLP's Clients to arrange payment of the remuneration incurred by the Joint Liquidators of WealthTek Nominees Limited, in relation to costs properly attributable to the distribution of Client Money to Clients of the LLP during the period 5 September 2024 to 31 May 2025 in the sum of £67,511.30 (excluding VAT), out of the Client Money held by the LLP.

Closing Date: 22 May 2026

To vote on the Proposed Resolutions please complete and return the attached voting form to me at the contact details below. If your voting form is not received by me by the Closing Date your vote will not be counted.

**Clients who have not assigned their rights to the FSCS (either because they were not eligible for, or who have chosen not to accept, FSCS compensation) are entitled to vote on this issue (i.e. because when accepting FSCS compensation, Clients' rights are automatically assigned to the FSCS). Clients who have accepted FSCS compensation are therefore not entitled to vote.**

Clients asserting claims over at least 10% of the total value of Client Assets held by the LLP may, within 5 business days from the date of issue of this notice, require the JSAs to call a meeting of Clients to consider the resolution.

You may apply to court to appeal any decision within 21 days of the Closing Date in accordance with Rule 202 of the Rules.



Shane Crooks  
Joint Special Administrator and Convener

Date: 5 May 2026

Contact: WealthTek Team  
Business Restructuring, BDO LLP, 5 Temple Square, Temple Street, Liverpool, L2 5RH  
Tel: +44 (0)20 7334 9191  
Email: [WealthTekClients@bdo.co.uk](mailto:WealthTekClients@bdo.co.uk)  
Reference: 00426532

# Appendix I

## VOTING FORM

Wealthtek Limited Liability Partnership ('the LLP') - In Investment Bank Special Administration  
Company registration number: OC355200  
Closing Date: 22 May 2026

<p><b>Name of Client</b></p> <input style="width: 100%; height: 30px;" type="text"/>	<p><b>Address</b></p> <input style="width: 100%; height: 100px;" type="text"/>
<p><b>Email</b></p> <input style="width: 100%; height: 30px;" type="text"/>	

### PROPOSED RESOLUTIONS - I WISH TO VOTE AS INDICATED BELOW:

	*Delete as applicable
<p>1. The amount of the JSAs' remuneration to be paid out of the Client Money held in accordance with CASS 7.17.2R within the Client Assets Sourcebook (as amended from time to time) published by the FCA as part of the FCA Handbook in respect of costs properly attributable to the distribution of Client Money incurred in pursuit of Objective One in the Special Administration ('Client Money Remuneration'), for the period 6 April 2025 to 5 April 2026, be and is hereby approved in the sum of £315,642.40 (excluding VAT)</p>	<input style="width: 100%; height: 80px;" type="text"/>
<p>2. The JSAs be and are hereby authorised by the LLP's Clients to arrange for payment of the Client Money Remuneration out of the Client Money held by the LLP</p>	<input style="width: 100%; height: 40px;" type="text"/>

	*Delete as applicable
<p>3. The JSAs be and are hereby authorised by the LLP's Clients to arrange payment of the remuneration incurred by the Joint Liquidators of WealthTek Nominees Limited, in relation to costs properly attributable to the distribution of Client Money to Clients of the LLP during the period 5 September 2024 to 31 May 2025 in the sum of £67,511.30 (excluding VAT), out of the Client Money held by the LLP.</p>	<input style="width: 100%; height: 80px;" type="text"/>

<p><b>Signature</b></p> <input style="width: 100%; height: 40px;" type="text"/>	<p><b>Name (BLOCK CAPITALS)</b></p> <input style="width: 100%; height: 40px;" type="text"/>
<p><b>Authority</b></p> <input style="width: 100%; height: 40px;" type="text"/>	<p><b>Dated</b></p> <input style="width: 100%; height: 40px;" type="text"/>

Please complete and return this form to WealthTek Team, Business Restructuring, BDO LLP, 5 Temple Square, Temple Street, Liverpool, L2 5RH or by email to [WealthTekClients@bdo.co.uk](mailto:WealthTekClients@bdo.co.uk) to be received no later than the Closing Date.