

Boston Prime Limited – In Special Administration

Special Administrators' Nineteenth Progress Report

For the period 9 February 2024 to 8 August 2024

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1 Purpose of this report

- 1.1 The purpose of this report is to provide clients and creditors with information in relation to the progress of the Special Administration of Boston Prime Limited (“the Company”) for the period 9 February 2024 to 8 August 2024 (“the Period”). It should be read in conjunction with the previous eighteen six monthly progress reports covering the period 9 February 2015 to 8 February 2024 (“the Previous Reports”).
- 1.2 The report has only been prepared for the purpose of compliance with statutory requirements under the Insolvency Act 1986, Insolvency (England and Wales) Rules 2016 (as amended) and The Investment Bank Special Administration Regulations 2011 (“SAR”). It has not been prepared for any other purpose and is not intended, nor suitable to be used, to inform any investment decision in relation to any debt of, or any financial interest in, the Company.
- 1.3 Any person that chooses to rely on any information referred to in this report for any purpose or in any context other than for the purpose of this report referred to above does so at their own risk.
- 1.4 To the fullest extent permitted by law, the Special Administrator, his firm, its employees and agents, do not have or assume any responsibility, and will not accept any liability in respect of, or as a result of, any decision or action taken, or refrained from, as a result of information contained in this report.

2 Statutory information

- 2.1 My colleague, Mike Rollings, and I were appointed Joint Special Administrators of the Company on 9 February 2015 by the High Court of England and Wales under court reference number 1051 of 2015. Mike Rollings resigned as Joint Special Administrator on the 4 July 2024 and was granted his release by the Court, further information about his resignation can be found at section 3.4 below.
- 2.2 This Special Administration is being handled by Menzies LLP of 6 Snow Hill, London, EC1A 2AY, following the merger of Rollings Butt and Menzies LLP with effect from the 1 July 2024. The trading address of the Company was Citypoint Suite 1248, 1 Ropemaker Street, London, EC2Y 9HT.
- 2.3 The registered office of the Company is 6 Snow Hill, London, EC1A 2AY and its registered number is 07435569. The Company was previously regulated by the Financial Conduct Authority (“FCA”), with the firm reference number 539846. I refer you to the Previous Reports for further information in this regard.
- 2.4 The then Special Administrators’ proposals were approved without modification by a meeting of the Company’s clients and creditors held on 8 April 2015. A creditors’ committee (“the Committee”) was formed.

3 Progress of the Special Administration

Objectives and strategy of the Special Administration

- 3.1 As detailed in the Previous Reports, and in accordance with the Special Administration Regime under the SAR, the Special Administrators have three objectives (“the Objectives”) although the order in which they appear does not indicate a hierarchy of priority between them:
- 1) to ensure the return of client assets as soon as is reasonably practicable;
 - 2) to ensure timely engagement with market infrastructure bodies and the authorities;
 - 3) to either—
 - a) rescue the investment bank as a going concern, or
 - b) wind it up in the best interests of the creditors.

I have outlined the Special Administrators’ progress in achieving these objectives during the Period below.

Receipts and payments account

- 3.2 Attached at Appendix A(i) is a Receipts and Payments account for the period 9 February 2024 to 8 August 2024 as well as a cumulative account (Appendix A(ii)) for the full period of the Special Administration, both in GBP and native currency.
- 3.3 During the Period, realisations included £15,661.04 in respect of interest on the funds held in the Special Administration bank accounts together with an additional payment from the Company's pre-Special Administration bankers in relation to the accounts held. There will be an amount to be paid in respect of Corporation Tax on the interest that has accrued, together with other interest received for the relevant tax year net of allowable deductions. This will be calculated during the next reporting period and details provided in the relevant Progress Report.
- 3.4 During the Period, £122,831.50 was approved by the Creditors' Committee and have been paid in relation to fees for the period 1 December 2023 to 30 April 2024. Further details of this and the work undertaken in the Period are set out in Section 5.5 below.
- 3.5 During the Period, Mike Rollings resigned as Joint Special Administrator due to his retirement and ceasing to act as a licensed Insolvency Practitioner. Due to his appointment being made by way of a Special Administration Order the rules allowed for this to be done by an application to court and a subsequent order granted on the 4 July 2024. The order also granted that the costs associated with this resignation be payable as an expense of the Special Administration. As such during the Period, costs of £17,529.70 has been incurred for CMS Cameron Mckenna Nabarro Olswang ("CMS") for legal services provided in respect of the application to Court. During the Period £10,974.80 was paid to CMS, with the balance being settled after the end of the Period.
- 3.6 Although not paid during the Period, we have incurred costs in relation to Camilleri Preziosi who provide legal services in relation to the ongoing litigation in Malta, which is referred to below. The total costs incurred are €22,710.20. These costs cover the period from September 2023 to June 2024. Additional work has been undertaken during the period from 30 June 2024 to the end of the Period, although it is not clear at the time of submitting this report what the amount of these costs are. Further details will be provided in our next report.

VAT

- 3.7 As you will recall from the Previous Reports, whilst the Company is registered for VAT it is subject to partial exemption special method type agreement reached with HM Revenue and Customs ("HMRC"). As such, only 94.97% of VAT reclaims submitted are recoverable. Irrecoverable VAT for the duration of the Special Administration totals £21,322.00.
- 3.8 In this, and the Previous Reports, expenses paid in the Special Administration are shown net of VAT and the cumulative amount of VAT paid (net of irrecoverable VAT) is shown as VAT receivable.

Corporation Tax ("CT")

- 3.9 CT Returns continue to be submitted to HMRC for the period of the Special Administration. During the Period, £100 CT penalty was paid to HMRC as unfortunately payment for the relevant liability was received by HMRC outside of the required period.

Client money claims and distribution

- 3.10 As advised in Previous Reports, the Special Administrators have processed all payments in respect of Client Money Claimants.

Unsecured Creditors and Dividends

- 3.11 As Previously Reported, the Special Administrators had declared and paid three interim dividends to unsecured creditors totalling 38.5416 pence in the £.
- 3.12 As you are aware, an interim distribution of 7.2208p in £ (included in the figure at 3.10) was declared payable to unsecured creditors in the previous period, 9 August 2023 to 8 February 2024. Whilst we have made a significant portion of these distribution payments, a number of factors have curtailed our ability to make payments to some of the creditors. These include but are not limited to the following:
- *complications arising from the ‘de-banking’, of entities in this sector around the world, and*
 - *creditors providing incomplete bank information and/or their bank’s being unable to accept payments, and*
 - *creditors’ insolvency and dissolution processes in multiple jurisdictions, and*
 - *sanctions related issues which required additional review by the Special Administrator’s staff.*
- 3.13 We have spent significant amounts of time writing and speaking to creditors that have felt some impact in order to try and assist them in obtaining the benefit of the distribution. We will continue working with creditors on this matter.
- 3.14 To date, I have agreed claims totalling £10,928,831.98 compared to estimated claims declared on the statement of affairs of £11,070,452. Provisions for unadjudicated claims currently totals £547,082.76. We are working with these creditors and our advisors to resolve the position in relation to these claims as soon as possible and expect to be able to clarify the position on such claims at the time of the next progress report or the next distribution to unsecured creditors, whichever is sooner.
- 3.15 Dividends declared to unsecured creditors to date reflected in the receipts and payments account total £4,230,901.68. This includes provisions for declared dividends that have not as yet been able to be paid as well as similar provisions for unadjudicated claims referred to above.

Regulatory Matters

- 3.16 As you will recall from the Previous Reports, the Special Administrators have liaised with the Financial Conduct Authority (“FCA”), keeping them informed of the progress being made and providing information when required. Details of the cancellation of the Company’s regulated permissions are set out in the Previous Reports.
- 3.17 The Special Administrators have also continued to co-operate with the Financial Services Compensation Scheme (“FSCS”), assisting them in the process of claims by providing information on claimants. As mentioned in Previous Reports we have been advised that the FSCS have made payments to a number of the Company’s creditors who met the relevant requirements to be able to submit a claim to the FSCS. We are continuing to work with the FSCS to determine the balance of the claim from the FSCS.
- 3.18 For the avoidance of doubt, information in respect of potential compensation claims has been disclosed to creditors previously and can be found at <http://rollingsbutt.com/case-documents/bostonprime/>.

Debtors

- 3.19 As detailed in the Previous Reports, any further recoveries from the Company's debtors are unlikely and therefore it is not cost-effective to continue to actively pursue these debts. Should any new evidence emerge to assist the Special Administrator in collecting the outstanding sums due, he will reanalyse the position accordingly.

4 Assets still to be realised*Liquidity providers*

- 4.1 In the Previous Reports, it has been stated that the Company has commenced legal proceedings in Malta against one of the Company's liquidity providers relating to activity on the Company's trading account in the aftermath of the Swiss National Bank's decision to de-couple the Swiss Franc from the Euro on 15 January 2015.
- 4.2 Owing to the sensitive and confidential nature of these proceedings, a detailed account of the progress in this respect cannot be disclosed in this report and some relevant and appropriate information has been provided in the Previous Reports.
- 4.3 During the Period, several hearings were held, during which two persons connected to the liquidity provider underwent cross-examination. Further hearings are still anticipated.
- 4.4 The Special Administrators regularly provide detailed updates to the Committee in respect of the progress of the litigation, and the key aspects and decisions of the proceedings are discussed and agreed with the Committee.

BT Prime

- 4.5 As advised in the Previous Reports, the Company submitted a claim of USD\$7.2m in the bankruptcy of BT Prime Ltd ("BT Prime"). This was initially partially agreed at USD\$1.7m and following ongoing correspondence between the Special Administrators and the legal advisors for BT Prime, a further USD\$2.5m has been accepted giving a total of USD\$4.2m, with the balance (USD\$3m) rejected as anticipated in the Previous Reports.
- 4.6 No further realisations were made in respect of BT Prime during the Period; however, their legal advisors have confirmed an additional distribution of USD\$91,980 will be received shortly. Realisations currently total USD\$2,037,966 (£1,702,200.49) which as a total represents c48% of the Company's USD\$4.2m claim.
- 4.7 It is anticipated that there will be further realisations from the Company's claim against BT Prime. However, the quantum of such realisations remains uncertain and further information will be provided at the time of the next progress report or the next distribution to unsecured creditors, whichever is sooner.

5 Special Administrators' costs*Remuneration*

- 5.1 The basis of the Special Administrators' remuneration has been agreed by the Committee by reference to the time properly spent by them and their staff in attending to matters arising in the Special Administration and can be drawn as and when funds permit, albeit that all remuneration drawn during the Special Administration has been with specific resolution of the Committee at periodic meetings held.

- 5.2 Time costs for the period from 9 February 2024 to 8 August 2024 are £115,268.50. This represents 328.70 hours at an average rate of £350.68 per hour. Attached as Appendix B (i) is a Time Analysis which provides details of the activity costs incurred by staff grade during this period in respect of the costs fixed by reference to time properly spent by the Joint Special Administrators and their staff in managing the Special Administration.
- 5.3 Time costs for the period 9 February 2015 to 8 August 2024 total £1,345,463.50. This represents 5,023.80 hours at an average cost of £267.82 per hour. A cumulative Time Analysis is also attached at Appendix B (ii).
- 5.4 Whilst the Joint Special Administrators' remuneration allows for funds to be drawn as and when funds are available, it was agreed with the Committee that only 80% of the Special Administrators' time costs incurred for the period from 1 May 2015 to 30 June 2018 would be drawn with the remaining balance to be considered at a later date. Remuneration since this period is drawn in accordance with the agreed resolutions and on discussion with the Committee. Further details can be found at Appendix C.
- 5.5 In the Period, time costs of £115,268.50 have been incurred, as set out in the Time Analysis set out in Appendix B(i). The vast majority of the time incurred relates to the following:
- *Statutory obligations including writing and circulating the 6 monthly progress reports to all creditors.*
 - *Complying with statutory requirements in relation to Mike Rollings' resignation as Joint Special Administrator.*
 - *Submitting quarterly VAT returns and communicating with HMRC regarding VAT reclaims.*
 - *Maintaining the Company records and the Receipts and Payments accounts.*
 - *Corresponding with Creditors to assist them in gaining the benefit of the distribution, establishing and clarifying their claims and assisting with general queries from the Creditor population.*
 - *Preparing payment documentation and processing payments to Creditors for the 3rd Interim distribution.*
 - *Preparing documents for the Creditors' Committee, conducting meetings and writing minutes.*
- 5.6 Post appointment fees to date and drawn on account total £1,159,464.00 (excl. VAT).
- 5.7 A narrative guide to the Special Administrators' time costs has been included at Appendix D and a copy of 'A Creditors' Guide to Administrators' Fees' is available on request.
- 5.8 Attached as Appendix C is additional information in relation to this firm's policy on staffing, the use of subcontractors, disbursements and details of our current charge-out rates by staff grade.
- Category 1 and Category 2 disbursements*
- 5.9 As disclosed in Previous Reports, the Committee passed a resolution authorising the Special Administrators to draw their Category 2 disbursements in accordance with the rates referred to in our proposals. A further schedule of these rates, and information on Category 1 disbursements, is attached at Appendix C.

6 Expenses incurred in the period 9 February 2024 to 8 August 2024

6.1 The following is a summary of expenses that have been incurred and/or paid in the Period:

Supplier/Service Provider	Nature of expense incurred	Incurred (£)	Paid in Period (£)	Outstanding in the Period (£)
Camilleri Preziosi	Legal Fees	19,547.43	-	19,547.43
CMS CMNO LLP	Legal Fees	17,529.70	10,974.80	6,554.90
Total			10,974.80	

6.2 As set out in Section 3.5 above, the costs for Camilleri Preziosi cover the period until June 2024. Additional work has been undertaken since June to the end of the Period and at the time of reporting details are awaited. Further details will be provided in our next report.

6.3 Details of the rationale for appointing the professional advisers that the Special Administrators are working with on this matter are set out at Appendix C.

6.4 For previously incurred expenses, please review the Special Administrators' Previous Reports.

7 Estimated outcome for creditors

Clients with FCA CASS Protection

7.1 The client money distributions were paid some time ago. No further client money distributions are anticipated. The return to client money creditors was c.90 pence in the pound.

Secured creditors and Prescribed Part

7.2 There is no registered security giving charges over the assets of the Company. Consequently, the provisions of S176A of the Insolvency Act 1986 in relation to a Prescribed Part will not apply.

Preferential creditors

7.3 As Previously Reported, the only preferential claim in the Special Administration was paid in full in October 2016.

Non-preferential unsecured creditors

7.4 Details in respect of declared and paid dividends to unsecured creditors can be found earlier in this report.

7.5 Whilst a further dividend is anticipated to be declared within the next year, the quantum and timing of this distribution currently remains uncertain. Further details will be provided to creditors as soon as possible.

8 Ending the Special Administration

8.1 At this stage, the Special Administrator intends to seek his discharge from liability under Paragraph 98 (2)(c) of schedule B1 to the Insolvency Act 1986 (as that provision applies to special administrations) immediately upon his appointment as Special Administrator ceasing to have effect. This will require the Special Administrator applying to the court.

8.2 As this is a Special Administration, under SAR the provisions of Paragraph 76 of Schedule B1 to the Insolvency Act 1986, which refer to an automatic end of an administration after 12 months, do not apply.

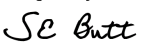
9 Creditors' rights

- 9.1 Within 21 days of the receipt of this report, a secured creditor, or an unsecured creditor (with the concurrence of at least 5% in value of the unsecured creditors) may request in writing that the Special Administrator provide further information about his remuneration or expenses (other than pre-Special Administration costs) which have been itemised in this progress report.
- 9.2 Any secured creditor, or an unsecured creditor (with the concurrence of at least 10% in value of the unsecured creditors) may within 8 weeks of receipt of this progress report make an application to court on the grounds that, in all the circumstances, the basis fixed for the Special Administrator's remuneration is inappropriate and/or the remuneration charged or the expenses incurred by the Special Administrator, as set out in this progress report, are excessive.

10 Next report

- 10.1 The Special Administrator is required to provide a progress report within one month of the end of the next six months of the Special Administration, or earlier if the Special Administration has been finalised.

Yours faithfully
For Boston Prime Limited

Signed by:

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Steve Butt
Special Administrator

Michael David Rollings and Steven Edward Butt were appointed as Joint Special Administrators of Boston Prime Limited by order of the High Court on 9 February 2015. Mr Rollings resigned with effect from 4 July 2024.

The affairs, business and property of the Company are being managed by the Special Administrator who acts as agent of the Company and without personal liability.

Steven Edward Butt is licenced to act in the UK as insolvency practitioner by the Insolvency Practitioners Association

The Company Number is 07435569 and the registered office is 6 Snow Hill, London. EC1A 2AY

Nineteenth Progress Report – Appendix A (i)

RECEIPTS AND PAYMENTS ACCOUNT FOR THE PERIOD FROM 9 FEBRUARY 2024 TO 8 AUGUST 2024 (IN GBP)

Statement of Affairs (£)	ASSET REALISATIONS	(£)	USD Accounts (£)	EUR Accounts (£)	AUD Accounts (£)	PLN Accounts (£)	JPY Accounts (£)
590,896	"Client Funds" Accounts	-	-	-	-	-	-
3,890,559	Cash at Bank	-	-	-	-	-	-
	Interest Received	12,661	-	-	-	-	-
	Pre-Appointment Bank Refund	-	-	-	-	-	-
	Pre-Appointment Bank Interest	-	-	-	-	-	-
14,945	Liquidity Provider Trading Account	-	-	-	-	-	-
2,194,248	Debtors	-	-	-	-	-	-
	Compensation - Bank	-	-	-	-	-	-
	Post-Appointment Bank Refund	3,000	-	-	-	-	-
	Total Receipts	15,661	-	-	-	-	-
	COSTS OF REALISATIONS						
	IT Suppliers	-	-	-	-	-	-
	Statutory Advertising	-	-	-	-	-	-
	Stationery & Postage	-	-	-	-	-	-
	Storage Costs	-	-	-	-	-	-
(4,449)	Trade & Expense Creditors	-	-	-	-	-	-
	Legal Fees	(10,975)	-	-	-	-	-
	Legal Disbursements	-	-	-	-	-	-
	Accountants Fees (Tax Advisors)	-	-	-	-	-	-
(560,896)	"Client Funds"	-	-	-	-	-	-
(11,070,452)	"Customer Funds"	-	-	-	-	-	-
	Bank Charges	(15)	-	-	-	-	-
(182,855)	Liquidity Provider Trading Account	-	-	-	-	-	-
	Intercompany Transfer to GBP	-	-	-	-	-	-
	Special Administrators' Insurance Bond	-	-	-	-	-	-
	Special Administrators' Pre Appointment Fees	-	-	-	-	-	-
	Special Administrators' Post Appointment Fees	(122,832)	-	-	-	-	-
	Special Administrators' Disbursements	-	-	-	-	-	-
	Employee Arrears/Holiday Pay	-	-	-	-	-	-
	Client Money Dividend	-	-	-	-	-	-
	Unsecured Creditors Dividend	-	-	-	-	-	-
	Unclaimed Dividend	-	-	-	-	-	-
	Corporation Tax	(100)	-	-	-	-	-
	Irrecoverable VAT	(1,346)	-	-	-	-	-
	DISTRIBUTIONS						
(221,750)	Ordinary Shareholders	-	-	-	-	-	-
	Total Payments	(135,267)	-	-	-	-	-
	Net Receipts/(Payments)	(119,606)	-	-	-	-	-

Notes:

All figures are exclusive of VAT. Please refer to the progress report for further information on potential VAT recovery.

Foreign Currency rate used as at 6 March 2015: USD 1.5060; EUR 1.3871; AUD 1.9529; PLN 5.7250; JPY 182.1316

Nineteenth Progress Report – Appendix A (ii)

RECEIPTS AND PAYMENTS ACCOUNT FOR THE PERIOD FROM 9 FEBRUARY 2015 TO 8 AUGUST 2024 (IN NATIVE CURRENCY)

Statement of Affairs (£)	ASSET REALISATIONS	(£)	USD Accounts (\$)	EUR Accounts (€)	AUD Accounts (£)	PLN Accounts (£)	JPY Accounts (£)
590,896	"Client Funds" Accounts	-	900,344	-	-	-	-
3,890,559	Cash at Bank	4,986,101	4,057,519	377,388	927,125	208,196	46,890,176
	Interest Received	24,246	6,456	-	8,635	-	-
	Pre-Appointment Bank Refund	610	-	-	-	-	-
14,945	Liquidity Provider Trading Account	-	-	-	-	-	-
2,194,248	Debtors	1,694,543	1,056,055	-	-	-	-
	Compensation - Bank	200	140	-	-	-	-
	Post-Appointment Bank Refund	3,000	-	-	-	-	-
	Total Receipts	6,708,701	6,020,514	377,388	935,760	208,196	46,890,176
	COSTS OF REALISATIONS						
	IT Suppliers	(305)	-	-	-	-	-
	Statutory Advertising	(14,137)	-	-	-	-	-
	Stationery & Postage	(3,982)	-	-	-	-	-
	Storage Costs	(108)	-	-	-	-	-
(4,449)	Trade & Expense Creditors	-	-	-	-	-	-
	Legal Fees	(486,136)	-	-	-	-	(1,743,256)
	Legal Disbursements	(30,742)	-	-	-	-	-
	Accountants Fees (Tax Advisors)	(10,500)	-	-	-	-	-
(560,896)	"Client Funds"	-	-	-	-	-	-
(11,070,452)	"Customer Funds"	-	-	-	-	-	-
	Bank Charges	(2,565)	(37)	-	-	-	(9,096)
(182,855)	Liquidity Provider Trading Account	-	-	-	-	-	-
	Intercompany Transfer to GBP	-	(5,258,723)	(377,388)	(935,760)	(208,196)	(45,137,824)
	Special Administrators' Insurance Bond	(4,000)	-	-	-	-	-
	Special Administrators' Pre Appointment Fees	(42,109)	-	-	-	-	-
	Special Administrators' Post Appointment Fees	(1,159,464)	-	-	-	-	-
	Special Administrators' Disbursements	(4,912)	-	-	-	-	-
	Employee Arrears/Holiday Pay	(663)	-	-	-	-	-
	Client Money Dividend	-	(761,753)	-	-	-	-
	Unsecured Creditors Dividend	(4,230,902)	-	-	-	-	-
	Unclaimed Dividend	(17,593)	-	-	-	-	-
	Corporation Tax	(6,023)	-	-	-	-	-
	Irrecoverable VAT	(21,322)	-	-	-	-	-
	Exchange Movements on transfer	27,230	-	-	-	-	-
	DISTRIBUTIONS						
(221,750)	Ordinary Shareholders	-	-	-	-	-	-
	Total Payments	(6,008,233)	(6,020,514)	(377,388)	(935,760)	(208,196)	(46,890,176)
		700,468	-	-	-	-	-

Notes:

All figures are exclusive of VAT. Please refer to the progress report for further information on potential VAT recovery.

Foreign Currency rate used as at 6 March 2015: USD 1.5060; EUR 1.3871; AUD 1.9529; PLN 5.7250; JPY 182.1316

Nineteenth Progress Report – Appendix A (ii)

RECEIPTS AND PAYMENTS ACCOUNT FOR THE PERIOD FROM 9 FEBRUARY 2015 TO 8 AUGUST 2024 (IN GBP)

Statement of Affairs (£)	ASSET REALISATIONS	(£)	USD Accounts (£)	EUR Accounts (£)	AUD Accounts (£)	PLN Accounts (£)	JPY Accounts (£)
590,896	"Client Funds" Accounts	-	603,099	-	-	-	-
3,890,559	Cash at Bank	4,986,101	2,812,501	292,477	502,352	38,059	289,808
	Interest Received	24,246	3,991	-	4,422	-	-
	Pre-Appointment Bank Refund	610	-	-	-	-	-
14,945	Liquidity Provider Trading Account	-	701,232	-	-	-	-
2,194,248	Debtors	1,694,543	94	-	-	-	-
	Compensation - Bank	200	-	-	-	-	-
	Post-Appointment Bank Refund	3,000	-	-	-	-	-
	Total Receipts	6,708,701	4,120,917	292,477	506,773	38,059	289,808
	COSTS OF REALISATIONS						
	IT Suppliers	(305)	-	-	-	-	-
	Statutory Advertising	(14,137)	-	-	-	-	-
	Stationery & Postage	(3,982)	-	-	-	-	-
	Storage Costs	(108)	-	-	-	-	-
(4,449)	Trade & Expense Creditors	-	-	-	-	-	-
	Legal Fees	(486,136)	-	-	-	-	(9,571.41)
	Legal Disbursements	(30,742)	-	-	-	-	-
	Accountants Fees (Tax Advisors)	(10,500)	-	-	-	-	-
(560,896)	"Client Funds"	-	-	-	-	-	-
(11,070,452)	"Customer Funds"	-	-	-	-	-	-
	Bank Charges	(2,565)	(25)	-	-	-	(50)
(182,855)	Liquidity Provider Trading Account	-	-	-	-	-	-
	Intercompany Transfer to GBP	-	(3,615,205)	(292,477)	(506,773)	(38,059)	(280,187)
	Special Administrators' Insurance Bond	(4,000)	-	-	-	-	-
	Special Administrators' Pre Appointment Fees	(42,109)	-	-	-	-	-
	Special Administrators' Post Appointment Fees	(1,159,464)	-	-	-	-	-
	Special Administrators' Disbursements	(4,912)	-	-	-	-	-
	Employee Arrears/Holiday Pay	(663)	-	-	-	-	-
	Client Money Dividend	-	(505,687)	-	-	-	-
	Unsecured Creditors Dividend	(4,230,902)	-	-	-	-	-
	Unclaimed Dividend	(17,593)	-	-	-	-	-
	Corporation Tax	(6,023)	-	-	-	-	-
	Irrecoverable VAT	(21,322)	-	-	-	-	-
	Exchange movements on transfer	27,230	-	-	-	-	-
	DISTRIBUTIONS						
(221,750)	Ordinary Shareholders	-	-	-	-	-	-
	Total Payments	(6,008,233)	(4,120,917)	(292,477)	(506,773)	(38,059)	(289,808)
		700,468	-	-	-	-	-

Notes:

All figures are exclusive of VAT. Please refer to the progress report for further information on potential VAT recovery.

Foreign Currency rate used as at 6 March 2015: USD 1.5060; EUR 1.3871; AUD 1.9529; PLN 5.7250; JPY 182.1316

Nineteenth Progress Report – Appendix B (i)

Time Entry - Detailed SIP9 Time & Cost Summary for the Period 9 February 2024 to 8 August 2024

Classification of Work Function	Partner	Manager	Associate	Business Trainee	Total Hours	Time Cost (£)	Average Hourly Rate (£)
100 : Administration & Planning	0.00	0.40	3.40	0.00	3.80	877.00	230.79
104 : Case Management	0.90	3.30	8.90	0.20	13.30	3,978.50	299.14
105 : Case Planning	4.40	3.50	7.70	0.00	15.60	6,498.00	416.54
106 : Maintenance of Records	0.00	0.00	1.60	0.00	1.60	344.00	215.00
107 : Statutory Reporting	1.90	0.40	10.10	0.00	12.40	3,668.00	295.81
108 : Statutory Compliance	5.60	3.20	13.80	0.00	22.60	8,459.00	374.29
109 : Review	0.00	2.30	3.20	0.00	5.50	1,527.50	277.73
111 : Billing	0.00	2.80	9.90	0.00	12.70	3,626.50	285.55
112 : Post Appointment Tax	0.00	2.90	4.20	1.80	8.90	2,572.50	289.04
116 : Case Accounting	0.10	0.00	0.30	1.90	2.30	455.50	198.04
117 : Bank Reconciliations	0.10	0.20	0.00	0.40	0.70	238.50	340.71
118 : Receipts & Payments	0.00	0.80	7.30	0.00	8.10	1,997.50	246.60
Administration & Planning	13.00	19.80	70.40	4.30	107.50	34,242.50	318.53
600 : Case Specific	0.60	8.80	2.40	0.00	11.80	5,629.00	477.03
Case Specific Matters	0.60	8.80	2.40	0.00	11.80	5,629.00	477.03
500 : Creditors	6.60	3.30	9.10	1.20	20.20	8,369.00	414.31
501 : Communication with Creditors	0.00	10.50	2.00	0.00	12.50	6,047.50	483.80
502 : Creditors Claims	1.20	6.90	1.70	0.00	9.80	4,867.00	496.63
505 : Creditors Committee	6.50	6.00	22.20	0.00	34.70	12,370.50	356.50
509 : Unsecured Creditors	18.60	10.90	89.50	2.60	121.60	38,028.00	312.73
Creditors	32.90	37.60	124.50	3.80	198.80	69,682.00	350.51
300 : Realisation Of Assets	0.80	1.00	0.00	0.00	1.80	1,075.00	597.22
301 : Assets - General	0.00	0.00	0.20	0.00	0.20	43.00	215.00
314 : Litigation	5.00	1.40	2.20	0.00	8.60	4,597.00	534.53
Realisation of Assets	5.80	2.40	2.40	0.00	10.60	5,715.00	539.15
Total Hours	52.30	68.60	199.70	8.10	328.70	115,268.50	350.68

Nineteenth Progress Report – Appendix B (ii)

Time Entry - Detailed SIP9 Time & Cost Summary for the period 9 February 2015 to 8 August 2024

Classification of Work Function	Partner	Manager	Associate	Business Trainee	Total Hours	Time Cost (£)	Average Hourly Rate (£)
100 : Administration & Planning	6.75	97.80	34.70	0.90	140.15	36,391.50	259.66
102 : Appointment	1.00	0.00	0.00	0.00	1.00	420.00	420.00
103 : Background Information	6.40	1.60	8.80	0.00	16.80	4,644.50	276.46
104 : Case Management	10.90	38.80	36.80	5.20	91.70	25,280.00	275.68
105 : Case Planning	52.90	34.80	66.20	6.70	160.60	52,353.50	325.99
106 : Maintanance Of Records	3.00	6.60	14.80	62.10	86.50	15,712.00	181.64
107 : Statutory Reporting	49.40	99.20	267.80	14.50	430.90	103,824.25	240.95
108 : Statutory Compliance	15.15	32.50	25.40	0.00	73.05	22,192.25	303.80
109 : Review	0.00	4.90	7.90	3.70	16.50	4,060.00	246.06
111 : Billing	1.60	5.40	28.00	2.60	37.60	9,166.50	243.79
112 : Post Appointment Tax	21.00	48.90	126.30	12.40	208.60	49,169.50	235.71
115 : Meetings	30.25	6.50	23.60	0.00	60.35	18,792.50	311.39
116 : Case Accounting	4.20	11.90	136.70	10.30	163.10	27,562.00	168.99
117 : Bank Reconciliations	1.00	4.60	16.40	2.70	24.70	5,388.00	218.14
118 : Receipts & Payments	0.00	32.70	112.40	0.10	145.20	26,451.50	182.17
119 : Closure	0.00	0.50	0.00	0.00	0.50	135.00	270.00
702 : Liaison With Directors	2.55	7.30	0.70	0.00	10.55	3,046.00	288.72
Administration & Planning	206.10	434.00	906.50	121.20	1,667.80	404,589.00	242.59
600 : Case Specific	85.15	118.60	96.10	1.90	301.75	89,217.00	295.67
Case Specific Matters	85.15	118.60	96.10	1.90	301.75	89,217.00	295.67
316 : Client Monies	81.15	63.00	39.90	0.00	184.05	60,003.00	326.01
317 : Customer Funds	35.75	100.30	109.50	0.00	245.55	56,538.50	230.25
500 : Creditors	84.15	166.10	492.00	22.90	765.15	169,164.50	221.09
501 : Communication With Creditors	3.00	24.50	7.90	0.00	35.40	16,460.50	464.99
502 : Creditors Claims	4.60	30.80	43.70	63.60	142.70	37,422.50	262.25
505 : Creditors Committee	177.55	248.40	357.50	1.30	784.75	224,026.75	285.48
508 : Employees	0.70	4.40	4.10	0.00	9.20	2,169.00	235.76
509 : Unsecured Creditors	20.20	11.40	89.50	6.30	127.40	39,967.50	313.72
510 : Pre Appointment Tax	12.50	11.30	5.50	0.00	29.30	11,513.50	392.95
Creditors	419.60	660.20	1,149.60	94.10	2,323.50	617,265.75	265.66
200 : Investigations	4.80	8.80	15.60	0.00	29.20	7,342.00	251.44
201 : CDDA Reports	4.70	11.40	27.00	0.00	43.10	9,055.50	210.10
203 : Investigatory Work	0.00	0.30	0.00	0.00	0.30	106.50	355.00
Investigations	9.50	20.50	42.60	0.00	72.60	16,504.00	227.33
300 : Realisation Of Assets	11.75	53.90	21.80	0.00	87.45	23,734.25	271.40
301 : Assets - General	0.30	0.20	0.20	0.00	0.70	298.50	426.43
302 : Identifying, Securing, Insuring Assets	0.00	0.00	4.90	1.20	6.10	908.00	148.85
303 : Book Debts	37.70	74.20	46.40	0.00	158.30	49,370.00	311.88
314 : Litigation	149.30	119.50	135.20	0.60	404.60	143,312.00	354.21
Realisation of Assets	199.05	247.80	208.50	1.80	657.15	217,622.75	331.16
801 : Shareholders - Communication	0.00	0.60	0.00	0.00	0.60	213.00	355.00
Shareholders	0.00	0.60	0.00	0.00	0.60	213.00	355.00
403 : Ongoing Employee Issues	0.00	0.00	0.40	0.00	0.40	52.00	130.00
Trading	0.00	0.00	0.40	0.00	0.40	52.00	130.00
Total Hours	919.40	1,481.70	2,403.70	219.00	5,023.80	1,345,463.50	267.82

Nineteenth Progress Report – Appendix C

Additional Information in Relation to Special Administrators' Fees Pursuant to Statement of Insolvency Practice 9

1 Policy

Detailed below is our policy in relation to:

- staff allocation and the use of sub-contractors;
- professional advisers; and
- disbursements

1.1 *Staff Allocation and the use of Sub-contractors*

The general approach to resourcing our assignments is to allocate staff with the skills and experience to meet the specific requirements of the case.

The constitution of the case team will usually consist of a Partner, a Manager, and an Associate. The exact constitution of the case team will depend on the anticipated size and complexity of the assignment and the experience requirements of the assignment. The charge out rate schedule in section 2 below provides details of all grades of staff and their experience level.

We are not proposing to utilise the services of any sub-contractors in this case.

1.2 *Professional Advisers*

On this assignment, we have used the professional advisers listed below. We have also indicated alongside, the basis of our fee arrangement with them, which is subject to review on a regular basis.

Name of Professional Adviser	Basis of Fee Arrangement
CMS Cameron Mckenna Nabarro Olswang (legal advice)	Hourly rate and disbursements
Camilleri Preziosi (legal advice)	Hourly rate and disbursements
Anderson Mori & Tomotsune (legal advice)	Hourly rate and disbursements (up to a capped fee)
Smith & Williamson	Agreed rate

Our choice was based on our perception of their experience and ability to perform this type of work, the complexity and nature of the assignment and the basis of our fee arrangement with them.

1.3 *Disbursements*

Category 1 disbursements do not require approval by creditors. The type of disbursements that may be charged as a Category 1 disbursement to a case generally comprise of external supplies of incidental services specifically identifiable to the case, such as postage, case advertising, invoiced travel and accommodation, external printing, room hire and document storage. Also chargeable will be any properly reimbursed expenses incurred by personnel in connection with the case.

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Category 2 disbursements do require approval from creditors. These are costs which are directly referable to the appointment in question but are not payments which are made to an independent third party and may include shared or allocated costs that can be allocated to the appointment on a proper and reasonable basis such as internal room hire, document storage or business mileage.

The disbursements which have been incurred are set out below:

Disbursement	Total cost incurred to 8 August 2024 £	Paid in a Previous Period £	Paid in Period £	Outstanding £
Advertising	73.00	73.00	NIL	NIL
Call Charges	198.31	107.84	NIL	90.47
Company Searches	726.10	11.00	NIL	715.10
Meeting Rooms	570.50	450.50	NIL	120.00
Miscellaneous	101.04	51.05	NIL	49.99
Photocopying	687.65	86.85	NIL	600.80
Postage	1322.33	605.95	NIL	716.38
Printing	1715.66	1597.28	NIL	118.38
Stationary	37.49	37.49	NIL	NIL
Storage	576.50	425.00	NIL	151.50
Travel	1471.10	1078.15	NIL	392.95
Total:	7,479.68	4,524.11	-	2,955.57

2 Charge-out Rates

A schedule of our charge-out rates for this assignment effective for this period is detailed below. For information on charge-out rates for the whole Special Administration, please refer to the Previous Reports.

Grade	Rate (£ per hour) 1 April 2022 – 31 March 2023	Rate (£ per hour) From April 2023
Partner	620	675
Director	495	535
Senior Manager	450	485
Manager	345-395	415
Assistant Manager	N/A	365
Senior Associate	N/A	280-320
Cashier	N/A	280
Associate	200-300	215-235
Business Trainee	130-195	160-205

Please note that the analysis of time in Appendix B includes the value of time incurred by staff graded as Director, Senior Manager, and Assistant Manager in the “Manager” column. This firm records its time in minimum units of 6 minutes.

NARRATIVE GUIDE TO ACTIVITIES UNDERTAKEN BY THE SPECIAL ADMINISTRATORS

From 9 February 2015 to 8 August 2024

Analysis Code	Description	Narrative
Administration and planning		
100	Administration & Planning	<ul style="list-style-type: none"> • Complying with internal case management procedures; filing, status checklists, IPS (internal case management system) administration, recording and analysing time incurred by the Special Administrators and their staff, maintaining/completing IP records • Preparation for internal and external meetings, including document production and review
102	Appointment	<ul style="list-style-type: none"> • Attending Court hearing
103	Background Information	<ul style="list-style-type: none"> • Retrieval of accounts and filings from Companies House and 3rd party Credit Search engines. • Requesting, printing, reviewing information provided by Director and 3rd parties. • Collating information relating to the Company prior to appointment, including details of assets, information relating to licence agreements, relevant online material.
104	Case Management	<ul style="list-style-type: none"> • Associate, Manager and Partner Reviews of Files
105	Case Planning	<ul style="list-style-type: none"> • Initial formulation and ongoing documentation of strategy to achieve special administration objectives • Consultation and ongoing correspondence with regulatory bodies (FCA and FSCS) to ensure strategy is appropriate • Ongoing consultation with legal advisors to ensure process and strategy are appropriate • Internal staff briefings and discussions relating to the progress of the case • Review of case workstreams to ensure appropriate staff assigned to appropriate tasks • Planning of future tasks necessary to achieve special administration objectives
106	Maintenance of Records	<ul style="list-style-type: none"> • Maintaining and amending IPS records
107	Statutory Reporting	<ul style="list-style-type: none"> • Drafting and amending the initial proposals • Preparation and maintenance of receipts and payments accounts • Drafting and preparing 6 monthly progress reports

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Analysis Code	Description	Narrative
108	Statutory Compliance	<ul style="list-style-type: none"> • Gathering of initial information to enable statutory filing and reporting to be completed, including creditor details, management accounts for Statement of affairs, details of assets/cash at bank • Initial notifications to the Registrar of Companies, Creditors, Shareholders, Directors, Court, FCA and FSCS • Advertisements in London Gazette and additional press as necessary • Review of Statement of Affairs and filing with the Registrar of Companies • Initial statutory bonding and regular checks for adequacy • Ensuring compliance with all relevant regulation and legislation within statutory periods including adherence to The Investment Bank Special Administration Regulations 2011 and (England & Wales) Rules 2011.
109	Review	<ul style="list-style-type: none"> • Internal review of files • Analysis of Work in progress and direct costs allocated to the estate
111	Billing	<ul style="list-style-type: none"> • Analysis of Work in Progress • Raising our Invoices as and when approved by the creditors' committee
112	Post Appointment Tax	<ul style="list-style-type: none"> • Initial information gathering relating to the Company's tax position • Correspondence relating to post-appointment VAT, PAYE, and Corporation Tax • Initial notification and subsequent communications to/from HM Revenue & Customs • Submission of relevant returns and ensuring all post-appointment liabilities are accounted for
115	Meetings	<ul style="list-style-type: none"> • Preparation of documents for initial creditors' meeting, agendas
116	Case Accounting	<ul style="list-style-type: none"> • Initial set-up and ongoing administration of special administration bank accounts • Processing of receipts and payments • Maintenance of IPS cash book • Correspondence with banks in respect of holding funds in specific currencies • Correspondence with banks in order to place funds into interest bearing accounts
117	Bank Reconciliations	<ul style="list-style-type: none"> • Reconciling IPS and bank accounts
118	Receipts & Payments	<ul style="list-style-type: none"> • Preparing and processing R&P accounts for creditors' committee and progress reports.
119	Closure	<ul style="list-style-type: none"> • Discussing the sending of a resolution to the creditors' committee

Nineteenth Progress Report – Appendix D

Analysis Code	Description	Narrative
702	Liaison With Directors	<ul style="list-style-type: none"> • Email/telephone correspondence with the Director relating to the Company • Information requests from the Director relating to the Company and/or third parties. • Email/telephone correspondence in respect of payments made to other group entities and third parties, including details of both cash movements and liquidity provider movements
Case Specific		
600	Case Specific	<ul style="list-style-type: none"> • Correspondence/Emails/Phone calls regarding retrieval of data from Forexware • Collating information received from Forexware • Legal correspondence regarding retrieval of data from Forexware • Correspondence with legal advisors of BT Prime • Correspondence regarding consideration of need to seek recognition of Special Administration in other jurisdictions. • Review of licencing agreements with Forexware • Investigations and discussions regarding trading data platform, feasibility of data retrieval, and general access to "back office" systems • Correspondence with liquidity providers regarding licenses and data retrieval • Correspondence with the FCA regarding the cancellation of part 4a permissions • Correspondence with the FSCS in relation to requests for information regarding creditors' claims
Creditors		
316	Client Monies	<ul style="list-style-type: none"> • Correspondence relating to monies covered by FCA CASS rules as detailed in customer terms and conditions • Reconciling segregated client balances with Company records • Establishing the status of monies held by the Company in accordance with FCA CASS rules. • Discussions with Counsel and CMS McKenna in respect of client monies and pooled funds as per FCA CASS rules.

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Analysis Code	Description	Narrative
317	Customer Funds	<ul style="list-style-type: none"> • Collation and review of information on client positions • Review of close out positions • Review of claims information provided by customers • Review of customer terms and conditions
500	Creditors	<ul style="list-style-type: none"> • Initial notifications to Creditors • Creation of web portal to provide general creditor information • Creation of documentation to be uploaded to web portal • Investigation work to establish accurate creditor postal and email addresses • Responses to general creditor queries to boston.prime@rollingsbutt.com • Administration of web portal and boston.prime@rollingsbutt.com • Preparation of documentation and venue for initial creditors' meeting • Collating information from clients and creditors in anticipation of adjudicating claims and future distributions • Processing and recording client and creditor claims in accordance with internal requirements
501	Communication with Creditors	<ul style="list-style-type: none"> • General correspondence with creditors
502	Creditor Claims	<ul style="list-style-type: none"> • Reviewing and considering creditors' claims and associated correspondence
505	Creditors Committee	<ul style="list-style-type: none"> • Correspondence with creditors' committee • Attendance at creditors' committee meetings • Preparation of documentation for Committee meetings
508	Employees	<ul style="list-style-type: none"> • Correspondence with former employees of the Company • Answering queries regarding the status of the Company and their employment • Managing employee claims in relation to potential arrears of pay, redundancy, holiday pay, PILON etc
509	Unsecured Creditors	<ul style="list-style-type: none"> • Planning for payment(s) of dividends to unsecured creditors • Processing dividend payments
510	Pre-Appointment Tax	<ul style="list-style-type: none"> • Liaising with pre-appointment accountants to establish tax position of Company • Reconciliation of pre-appointment HMRC claims • Gathering information from HMRC relating to outstanding balances due for pre-appointment tax periods • Filing any returns due for pre-appointment period

Analysis Code	Description	Narrative
Investigations		
200	Investigations	<ul style="list-style-type: none"> • Correspondence with director and former directors regarding obligations to file CDDA report • Review of information provided by Director and former directors • Investigatory work required for the completion of CDDA reports
201	CDDA Reports	<ul style="list-style-type: none"> • Drafting and filing of CDDA report
203	Investigatory Work	<ul style="list-style-type: none"> • General Investigation work regarding the special administration period
Realisation of Assets		
300	Realisation Of Assets	<ul style="list-style-type: none"> • Initial correspondence notifying banks of special administration and requirement to freeze all funds • Correspondence with banks to retrieve funds held by the Company • Reconciling funds received to funds believed to be held • Legal correspondence to retrieve funds from Japanese bank • Submitting and reviewing claim in class action against one of the Company's former liquidity providers
302	Identifying, Securing, Insuring Assets	<ul style="list-style-type: none"> • Initial notification to insurers to provide open cover • Review of Company's previous insurance provisions • Ongoing correspondence with insurers regarding potential insurance for Company assets
303	Book Debts	<ul style="list-style-type: none"> • Initial notification to debtors of the special administration • Investigation into nature of relationship with Company • Reconciling Company records with debtor records • Legal correspondence regarding debtors • Correspondence relating to retrieval of balances due from debtors • Reconciliation of received funds with Company records • Consultation with legal advisers in respect of potential future litigation against third parties
314	Litigation	<ul style="list-style-type: none"> • Correspondence with CMS Cameron McKenna Nabarro Olswang LLP and Camilleri Preziosi in respect of litigation against third parties • Preparing and reviewing documents for court application and court hearings • Attending court hearings in Malta

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Analysis Code	Description	Narrative
Trading		
403	Ongoing Employee Issues	<ul style="list-style-type: none"> • Preparing documents for employee claims