

Our ref: H146/3046268

2 April 2024

UHY Hacker Young LLP
Quadrant House
4 Thomas More Square
London E1W 1YW

Phone +44 20 7216 4600
Fax +44 20 7767 2601
Email tandr@uhy-uk.com
Web www.uhy-uk.com

TO ALL KNOWN CLIENTS

Dear clients

Hartley Pensions Limited – In Administration (the "Company") Peter Kubik and Brian Johnson of UHY Hacker Young LLP, in their capacity as Joint Administrators of the Company (the "JAs")

As you may be aware from the latest client communications released on 28 February 2024, the Company is now in receipt of funds from the Financial Services Compensation Scheme ("**FSCS**") which will be used to cover the costs associated with an orderly transfer out of clients' SIPPs to new appropriately regulated operators or otherwise settling their accounts via a return of assets. For the avoidance of doubt, the funding received from the FSCS has allowed the Company to administer the transfer out process without the need to charge clients an exit and administration charge. We write to provide you with an update on this process.

If you hold a SSAS with the Company a separate update will be issued shortly in this regard.

Client contact details

Clients will be contacted regarding the transfer out process by post only. It is therefore imperative that an up-to-date postal address is held for you and we recommend clients contact the team at Hartley (by email at admin@hartleypensions.com) to check the address we hold for you is correct.

Transfer out process

Due to the difference between the nature of clients' assets held within their SIPPs and the different contractual relations for each SIPP Scheme, the JAs have grouped categories of clients into tranches to streamline the transfer out process. The options given to each client with regards to the transfer out process will depend on the tranche that each client falls into. The options available to each SIPP member will be set out in an individual letter which will be posted to your home address. The letter will set out your options as well as enclose the following documents (together the "**Documents**"):

1. **A client asset statement** - this document will provide you with a breakdown of the assets that you hold within your SIPP according to the Company's books and records, and the JAs verification process;
2. **A response form** – if required, this is a form that should be completed by you and returned to the Company only in the event that you do not agree with your asset statement, together with any documentation you hold to support the potential discrepancy;

UHY Hacker Young turnaround and recovery is a division of UHY Hacker Young LLP.
A list of members' names and their professional qualifications is available for inspection at the Registered Office at the above address.

Peter Kubik and Brian Johnson are licensed in the UK by the Insolvency Practitioners Association.
Insolvency Practitioners are bound by the Insolvency Code of Ethics when carrying out all professional work relating to an insolvency appointment.

UHY Hacker Young LLP's privacy notice is available at <https://www.uhy-uk.com/privacy-policy/>.

A member of the UHY Hacker Young Group of independent UK firms.
A member of UHY International, a network of independent accounting and consulting firms.



3. **A transfer out form** - this is a transfer out form which you should complete and return to the Company via post providing details as to which operator you wish to be transferred to should you not want to transfer to any nominated operator who is notified to you in the letter referenced above; and
4. **A pension liberation leaflet** - this is a leaflet which provides clients details on the dangers associated with any potential pension scams when transferring your SIPP.

Given the Company's substantial client base it is not feasible to transfer all client SIPPs at the same time or on an ad hoc basis at the individual request of a client. Therefore, the Company will prioritise the transfer of the SIPPs according to the tranches set out below. Each tranche will receive the Documents in the timeframe as identified below.

Tranche	Group	When the Documents will be received
1	White label SIPP clients	April
2	Small pot clients with less than £10,000 in cash and/or asset value in their SIPP, are of pensionable age and no impaired assets	April
3	Deceased SIPP clients	May
4	Clients to be transferred by way of a bulk transfer	May
5	Clients being transferred out individually	June
6	Clients with impaired assets	June

More details of the above Tranches are provided below. Please note that the timescales are subject to change.

Term	Explanation
White Label SIPP clients	A White Label SIPP is a bespoke SIPP operated and administered by the Company but branded in the name of the platform offering that SIPP product to the underlying clients.
Clients with less than £10,000 in their SIPP, are of pensionable age and no impaired assets	This relates to clients who are of pensionable age and have £10,000 of assets (cash or otherwise) which can be liquidated and the funds distributed to the client. Clients must agree to this process as there may be tax consequences subject to your personal position. Please note neither Hartley nor UHY can advise on your personal position.
Deceased SIPP client	A deceased SIPP client is a client who has passed away but their assets have not yet been distributed.
Clients subject to a bulk transfer	Discussions are ongoing with potential operators who may be willing to on-board part of the SIPP book (this is regardless of what scheme each client is within). If an agreement can be made with an operator(s), the relevant

	clients will be given the option to be transferred to this operator(s). It is termed a bulk transfer as it is anticipated that a large number of clients will be transferred to the same operator under an agreement.
Individual transfer out	Those clients who either choose not to be a part of any bulk transfer or who are not given an option to be a part of a bulk transfer will be individually transferred out to an operator of the client's choice.
Impaired asset	These are assets which are irrecoverable, compensated by the FSCS or have a nil value.

Processing of the Documents

As and when clients complete and return the Documents, we will be in contact to keep you updated on the process and timescales for transferring out your SIPP or settling your account, which will be determined by the nature of your SIPP, the instructions that you give to the JAs, and any dispute over the accuracy of the client asset statements.

FS Legal

FS Legal released client communications on 28 February 2024 in response to our own client update stating:

"Please note that we believe the content of this update to be defamatory in nature and we have also referred the matter to the FCA and the FSCS as UHY have clearly misled the SIPP Members as to the position on costs."

We do not accept that this statement is correct and our position remains the same as we stated it to be in our last update. The only official updates can be found on the UHY, FCA and FSCS websites and we want to ensure that there is no unnecessary confusion caused by incorrect publication of information. We have nothing further to add.

Yours faithfully



Peter Kubik

Joint administrator

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