

The Investment Bank Special Administration (England and Wales) Rules 2011

## Special Administrator's progress report

Name of Company AFX Markets Ltd
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Company number 07612002
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In the Business & Property Courts Insolvency & Companies List  (full name of court)
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Court case number CR-2019-005638
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(a) Insert full name(s) and address(es) of administrator(s)

I/We (a)  
Jonathan E Avery-Gee  
CG&Co  
27 Byrom Street  
Manchester  
M3 4PF

Daniel Richardson  
CG&Co  
27 Byrom Street  
Manchester  
M3 4PF

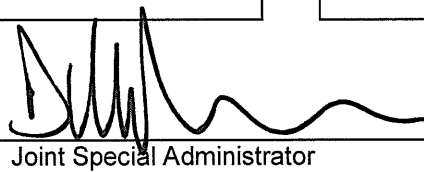
Special Administrators of the above company attach a progress report for the period

(b) Insert date

From (b) 27 August 2025
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To (b) 26 February 2026
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Signed



Joint Special Administrator

Dated

20 March 2026

# Joint Special Administrators' Progress Report

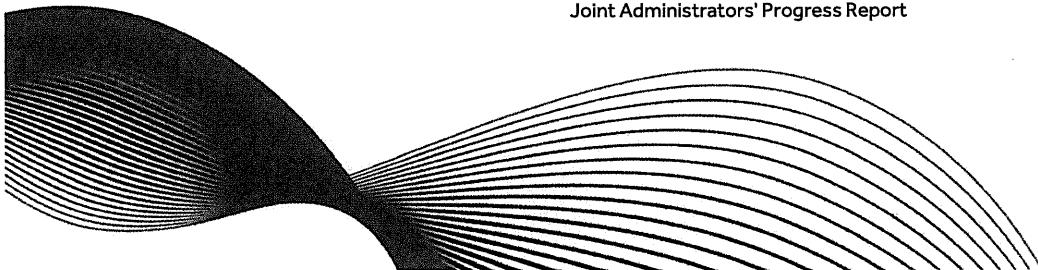
**AFX Markets Ltd  
- In Special Administration**

**For the period from 27 August 2025 to 26 February 2026**

This report has been prepared for the sole purpose of updating the creditors for information purposes. The report is private and confidential and may not be relied upon, referred to, reproduced or quoted from, in whole or in part, by creditors for any purpose other than updating them for information purposes, or by any other person for any purpose whatsoever.

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

Joint Administrators' Progress Report



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## THE SPECIAL ADMINISTRATORS' PROGRESS REPORT

### 1 Introduction

1.1 I, Daniel Richardson, together with my partner Jonathan Avery-Gee, were appointed Special Administrators ("the Special Administrators") of AFX Markets Ltd (the **Company**) on 27 August 2019. The appointment was made in the High Court of Justice, Business and Properties Courts of England & Wales, Insolvency and Companies List (ChD), in accordance with the provisions of The Investment Bank Special Administration Regulations 2011 (the Regulations), following an application by the Financial Conduct Authority (FCA).

1.2 This Administration is being handled by CG&Co at 27 Byrom Street, Manchester, M3 4PF. The Special Administrators' contact details are by phone on 0161 358 0210 or via email at [info@cg-recovery.com](mailto:info@cg-recovery.com). The Administration is registered in the Business & Property Courts Insolvency & Companies List, reference number CR-2019-005638.

1.3 As Special Administrators, we are required to provide a progress report covering the period of six months commencing from the date the Company entered Administration and every subsequent period of six months. This progress report covers the period from 27 August 2025 to 26 February 2026 (the **Period**) and should be read in conjunction with our earlier proposals report and any previous progress reports which have been issued.

1.4 Information about the way that we will use, and store personal data on insolvency appointments can be found at <https://cg-recovery.com/privacy-policy-2/>. If you are unable to download this, please contact us and a hard copy will be provided to you.

1.5 The trading address of the Company was 2nd Floor, 33 Sun Street, London, EC2M 2PY. The business traded under the names:

AFX Capital	From 14.05.2012
AFX Group	From 20.04.2016
Quantic Prime	From 17.08.2017
STO	From 26.08.2016
SuperTradingOnline UK (STO UK)	From 16.04.2013

1.6 The registered office of the Company is 27 Byrom Street, Manchester, M3 4PF and its registered number 07612002.

1.7 Prior to the Joint Special Administrator's appointment, a review of ethical issues was undertaken, and no ethical threats were identified. A further review has been carried out, and no threats have been identified over the Review Period.

### 2 Receipts and Payments

2.1 At Appendix A is our Receipts and Payments Account covering the period of this report together with a cumulative Receipts and Payments Account from the date of our appointment as Special Administrators to 26 February 2026.

2.2 In Section 3 below, you will find an update on the progress made during the Period in realising the Company's assets and dealing with its affairs.

### 3 Progress of the Special Administration

3.1 You may recall that the Special Administrators have three Objectives, which are set out in the Regulations, namely:

- (i) To ensure the return of Client Money as soon as is reasonably practicable;
- (ii) To ensure timely engagement with market infrastructure bodies and the Authorities; and
- (iii) Either (a) rescue the Company as a going concern; or (b) to wind it up in the best interests of creditors.

3.2 The Regulations require the Special Administrators to commence work on each Objective immediately after their appointment. There is no hierarchy in the Objectives, the Special Administrators must work towards achieving the best outcome overall for clients and creditors.

3.3 The Special Administrators are pursuing Objective (i) as a priority whilst concurrently pursuing Objectives (ii) and (iii). As mentioned earlier, the Special Administrators are in communication with market infrastructure bodies and the Authorities. The Special Administrators consider it is not possible to rescue the Company as a going concern and are taking the necessary steps to wind up the Company's affairs.

3.4 In addition to pursuing this statutory objective, the Special Administrators have duties imposed by Insolvency and other legislation, some of which may not provide any financial benefit to creditors.

3.5 This section of the report provides creditors with an update on the progress made in the Period, both in terms of the achievement of the statutory objective but also work which is required of the Special Administrators under other related legislation.

3.6 In accordance with the Investment Bank Special Administration (England and Wales) Rules 2017 ("the Rules") the Special Administrators have instructed solicitors to advise on the strategy for the conclusion of this Special Administration. The proposed strategy is to prepare a report to the Creditors Committee, setting out the steps to be taken by the Special Administrators leading up to the setting of a final Bar date, which will be a final date for clients to prove their claims in this Special Administration.

3.7 As you will recall, we have been liaising with the FCA and the Financial Services Compensation Scheme ("FSCS") in order to make an Application to the High Court for a Distribution Plan. The purpose of which is to give clients one final opportunity to submit their claim to the Special Administrators for onward transmission to the FSCS, (subject to the formal adjudication of the claim and it being verified as a correct claim).

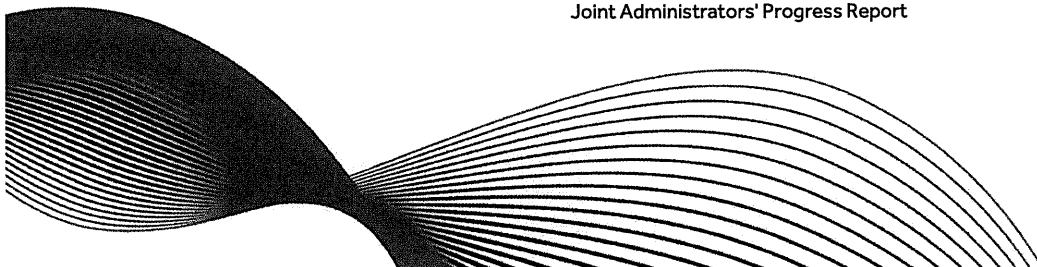
3.8 Whilst working with both the FCA and the FSCS, the Special Administrators have incurred, and continue to incur, legal fees whilst receiving advice and assistance in the formulation of the Distribution Plan and compiling the witness statement that is necessary for the intended Court application.

3.9 This section of the report provides creditors with an update on the progress made in the Period, both in terms of the achievement of the statutory objective, but also work which is required of the Joint Special Administrators under other related legislation.

#### *Administration (including statutory compliance & reporting)*

3.10 As noted above, the Special Administrators must comply with certain statutory obligations under the Insolvency Act 1986 and other related legislation. Details about the work that we anticipated would need to be done in this area and has been done can be summarised as follows:

Joint Administrators' Progress Report



- Notifying creditors of the Special Administrators' appointment and other associated formalities including statutory advertising and filing relevant statutory notices at Companies House
- Formulating, monitoring and reviewing the Special Administration strategy
- Review of Client Accounts and dealing with Client queries, details of which are provided further in this report. Receiving and responding to client emails. To date there has been 10,766 exchanges of emails with clients and their representatives.
- Dealing with queries arising during the appointment
- Reviewing matters affecting the outcome of the Special Administration
- Consideration of foreign exchange conversion on claims
- Setting up Special Administration bank accounts, including trust account for client monies and dealing with the Company's pre-appointment accounts.
- Liaising and attending meetings with the FCA as regards strategy
- Liaising and attending meetings with the FSCS as regards strategy for the payment of compensation to Clients, details of which are explained further in this report.
- Liaising with legal advisors regarding the pursuit of monies in Switzerland and Cyprus; the lifting of the Freezing Order; and possible Director preferences.
- Collating information from the Company's records regarding the assets and liaising with Agents regarding the uplift and sale of those assets
- Arranging insurance cover for the assets
- Drafting and circulating our proposals to Members, Clients and Creditors for achieving the objectives of the Special Administration and thereafter providing periodic progress reports to Members, Clients and Creditors (typically every 6 months)
- Convening and preparing for the Initial Meeting of Clients and Creditors and attendance at that meeting.
- Creating and updating the list of clients and unsecured creditors as and when claims are received and responding to all enquiries by telephone, email and post.
- Lodging periodic returns with the Registrar of Companies for the Special Administration.
- Complying with statutory duties in respect of the Special Administrators' specific penalty bond.
- Reconciling post-appointment bank accounts to internal systems
- Creation and update of case files on the firm's insolvency software
- Documenting strategy decisions
- Redirection of the Company's mail to the Special Administrators' office. Reviewing and responding to letters received.
- Establishing and holding periodic meetings of the creditors' committee and associated filing formalities
- Securing the Company's books and records
- Pension regulatory reporting and auto-enrolment cancellation
- Completion and filing of the notice of the Company's insolvency to HMRC.
- Periodic case progression reviews

Joint Administrators' Progress Report

- Opening, maintaining and managing the Special Administration estate cashbook and bank accounts
- Submission of all post-appointment VAT Returns
- Dealing with employees to provide support and assistance in lodging any claims they may be entitled to make for unpaid wages, holiday pay and other statutory entitlements from the National Insurance Fund and the Company.
- Reviewing time cost data and producing analyses of time incurred which is compliant with Statement of Insolvency Practice 9
- Initial assessment required by Statement of Insolvency Practice SIP2 and the Company Directors Disqualification Act 1986 ("CDDA") including the review of the Company books and records and the identification of potential further asset realisations which may be pursued in the Special Administration

3.11 The costs of statutory compliance work and reporting to creditors has exceeded the initial estimate, as the duration of the case has taken longer than anticipated due to the receipt of ongoing claims and liaising with clients in respect of their claims. In doing so, this has delayed the Special Administrators from finalising their proposed distribution plan to be placed before the Creditors Committee and the proposed application to Court to set a Hard Bar date.

3.12 The Special Administrators are still encouraging clients to come forward and submit their claims for adjudication for onward transmission to the FSCS (subject to the claims being valid). This therefore requires the Special Administration to remain open and, as a consequence, places further statutory reporting requirements on the Special Administrators in compliance with the relevant Insolvency legislation.

3.13 As noted in our initial fees estimate/information, this work will not necessarily bring any financial benefit to creditors but is required on every case by statute.

#### *Realisation of Assets*

3.14 We would refer creditors to our previous reports for details of assets realised in the period from 27 August 2019 to 26 August 2025. The following assets have been realised since that time:

#### **Bank Interest Gross**

3.15 During this period a sum of £11,722.94 has been received by way of gross bank interest giving a total sum received within this Special Administration of £91,934.58.

#### **HM Revenue & Customs ("HMRC")-Tax Refund**

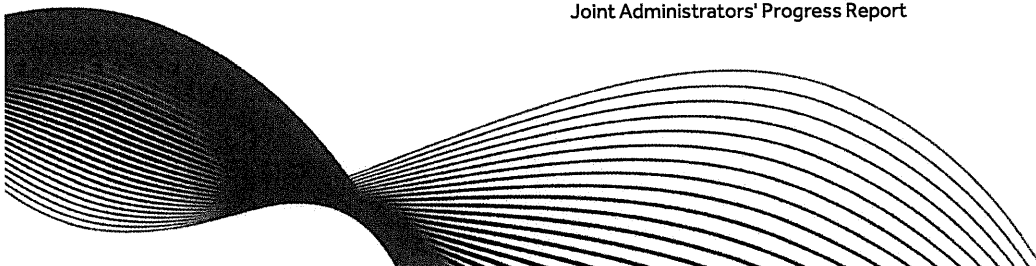
3.16 A Corporation Tax refund of £80.71 was received from HMRC.

3.17 It is anticipated that the work the Special Administrators and their staff have undertaken to date has brought a financial benefit to both clients and ordinary unsecured creditors as a dividend is anticipated to be paid in this matter. It should be noted that a dividend of 100p in the pound has been paid to the preferential creditors in this matter. Any funds determined as "Client funds" will be distributed in accordance with the Regulations as referred to in point 3.1.

#### *Creditors (claims and distributions)*

3.18 The Special Administrators are not only required to deal with correspondence and claims from unsecured creditors but also those of any secured and preferential creditors of the Company. There is no secured creditor but there are preferential creditors.

Joint Administrators' Progress Report



- 3.19 Work undertaken by the Special Administrators in dealing with a company's creditors may only bring a financial benefit to certain classes of creditor however the Special Administrators are required by statute to undertake work for all classes of creditor. Similarly, if a distribution is to be paid to any class of creditor, work will be required to agree those claims and process the dividend payments to each relevant class of creditor. The more creditors a company has, the more time and cost will be involved by the Special Administrators in dealing with those claims.
- 3.20 More information on the anticipated outcome for all classes of creditor in this case can be found in Section 4 below.
- 3.21 At this stage we consider the following matters worth bringing to the attention of creditors:
- There are approximately 17 unsecured trade and expense creditor claims in this Special Administration with an estimated value of £814,725.20.
  - HMRC has submitted a claim in the sum of £1,592.00 for Value Added Tax ("VAT") and a claim in the sum of £212,264.65 for Corporation Tax.
  - There were 603 clients on the list provided by the Directors showing a total sum of £7,665,711 being owed.
  - There are 316 clients on the list provided by the Directors showing that no debt was owed to them.
  - There were 4 employees who submitted claims to the RPO. The formal claim from the Redundancy Payments Service ("RPS") has been received and the Preferential creditor claim is £5,924.25 and has been paid in full.

#### Investigations

- 3.22 You may recall from our first progress report to creditors that some of the work Administrators are required to undertake is to comply with legislation such as the Company Directors' Disqualification Act 1986 (CDDA 1986) and Statement of Insolvency Practice 2 – Investigations by Office Holders in Administration and Insolvent Liquidations and may not necessarily bring any financial benefit to creditors, unless these investigations reveal potential asset recoveries that can be pursued for the benefit of creditors.
- 3.23 Our report on the conduct of the Directors of the Company to the Department for Business, Energy & Industrial Strategy under the CDDA 1986 was submitted during the first period of the Administration and is confidential.
- 3.24 Since our last progress report we would advise that no further asset realisations have come to light that may be pursued by us for the benefit of creditors.
- What remains to be done in the Administration*
- 3.25 The Joint Special Administrators are continuing to liaise with the FSCS on claims already submitted and providing further information when requested as well as submitting new claims as and when received. The Joint Special Administrators will liaise with HMRC in respect of the filing of the necessary Corporation Tax and VAT forms The Joint Special Administrators will continue to perform their statutory duties in reporting to clients and creditors and the filing of the appropriate documentation at Companies House and the Court accordingly..
- 3.26 As mentioned above, in accordance with the Rules, the Joint Special Administrators have instructed solicitors to advise on the strategy for the conclusion of this Special Administration. The proposed strategy is to prepare a report to the Creditors Committee, setting out the steps

to be taken by the Joint Special Administrators leading up to the setting of a final Bar date, which will be a final date for clients to prove their claims in this Special Administration. This will be supported by an application to Court in order to formally set the Bar Date (as set out below).

- 3.27 The Special Administrators are continuing to liaise with both the FSCS and the FCA on the proposed strategy referred to above as well as ensuring that all legislative requirements are met. The Special Administrators have been liaising with the FCA in relation to the steps taken to contact all customers that have yet to provide details of their claim in advance of the Bar Date.
- 3.28 The effect of a bar date is that once it has passed, any subsequent distribution by the Special Administrators cannot then be disturbed by any client who might later make a claim against the relevant client money.
- 3.29 Following a review of the outstanding claims there are still 202 clients who have yet to submit their claims in this matter. The Special Administrators have communicated by either post or emailed those clients for their claims. In addition, there are 25 clients who have submitted claims but who have not provided satisfactory documentation to enable their claims to be adjudicated. These clients have also been contacted by both post and email for the remaining documentation in order that their claims can be adjudicated and, if considered valid, passed to the FSCS for processing.
- 3.30 Should such claims be received, they will need to be processed in a similar manner to those already submitted to ensure that they can be accepted by the FSCS.
- 3.31 There are 22 clients whose claims totalling £736,581.27 were accepted as valid by the Special Administrators but were rejected by the FSCS as they did not meet the FSCS criteria for compensation. These claims will form part of the distribution of the client funds held by the Special Administrators in due course.
- 3.32 This strategy will be placed before a meeting of the Creditors Committee for approval. If approved, the Special Administrators will then make an Application to the Court for the approval of the Court to set the final Bar date (together with ancillary directions) in order to proceed as mentioned above.
- 3.33 Once Court approval has been received, the Special Administrators will then proceed to distribute the funds held in their possession in line with the Court Order (subject to complying with the firms AML requirements). Please note that the distributions will be subject to the costs of this Special Administration.

#### 4 Estimated Outcome for Creditors

##### Secured Creditors

- 4.1 As previously advised the Company did not grant any security over its assets and therefore there are no secured creditors. As a result, there are no floating charge assets and therefore no requirement for a Prescribed Part calculation.

##### Preferential Creditors

- 4.2 Preferential creditors encompass liabilities for employees in respect of arrears of pay, accrued but unpaid holiday pay and any unpaid pension contributions. Such claims will be paid by the RPS Preferential claims in respect of outstanding wages are capped at a maximum of £800 per employee.
- 4.3 Preferential Creditor claims were estimated at £3,200 and a claim was received from the RPS in the sum of £5,924.25 and a dividend of 100 pence in the £ has been paid to them.

### Unsecured Creditors

- 4.4 We have received unsecured trade and expense creditor claims totalling £768,633.91 from 10 creditors. We have yet to receive claims from 7 creditors whose debts are estimated at £38,092.13 as per the estimated financial statement as prepared by the Special Administrators as detailed in the Special Administrators Proposals. HMRC has submitted a claim in the sum of £1,592.00 for VAT and a claim in the sum of £212,264.65 for Corporation Tax.
- 4.5 Based on present information it is anticipated that unsecured creditors will receive a distribution. The quantum at present cannot be determined.

### Client claims

- 4.6 Clients and Creditors will recall that in our last progress report we advised as follows:
- There were 603 clients on the list provided by the Directors showing a total sum of £7,665,711 being owed.
  - There were 316 clients on the list provided by the Directors showing that no debt was owed to them.
- 4.7 Since our last progress report a full review of the clients claims, whether submitted or not, has been undertaken and therefore the revised claims position is as follows:
- a) The number of clients who informed the Special Administrators that they had a potential claim against the Company in respect of their investments initially totalled 710 of which there were 54 duplicate claims.
  - b) 454 clients, who claimed to be owed a combined sum of £14,283,991.41 submitted claims to the Special Administrators.
  - c) 25 clients submitted claims totalling £379,044.11 to the Special Administrators but have failed to provide the required documentation to enable such claims to be adjudicated upon. The Special Administrators have now written to these clients requesting the resubmission of their claims with full supporting documentation to enable those claims to be adjudicated upon and, if appropriate, submitted to the FSCS for compensation.
  - d) 366 client claims whose net total is £8,701,580.08 have been accepted as valid by the Special Administrators. This list includes clients who have had part of their claim rejected and who have had a reduced value placed on their claims (see e below). Details of these claimants have been passed to the FSCS and those clients have been advised on how to claim compensation from the FSCS.
  - e) 91 client claims (included in d above) have had part of their claim rejected and the total sum rejected from those claims was £416,742.12. This can be attributed to overclaiming, where only the sum owed as per their AFX statement was accepted; or where the claim included interest added by the claimant; or where the full initial deposits were claimed and not what was correctly owed.
  - f) 62 client claims totalling £4,742,461.93 have been rejected in full where there has been no evidence of these clients having had monies deposited into the Company's bank account; where they are clients of AFX Capital Markets Ltd; and where such clients are not listed as

a client of the Company and have failed to provide any evidence so show that they are an actual client of the Company.

- g) 202 clients, with a combined estimated sum owed of £822,969.09 have not submitted a claim to the Special Administrators. These clients have been either contacted by post and/or email requesting they submit their claims for adjudication or, alternatively, confirm that they have no claim.

4.9 The Joint Special Administrators can advise that, following discussions with the FSCS, client claims have now been submitted to the FSCS for processing and those clients have been contacted with instructions on how to process their claims with the FSCS for compensation.

4.10 The FSCS has advised as follows:

Total claims received	379	
Complete and Paid	298	
Rejected	49*	(17 as duplicates)
Claims in Progress	1	
No Application Form	23	
Inactive	8	

\* It should be noted that some potential clients approached the FSCS direct without submitting their claims to the Special Administrators and, as the claims had not been verified, they were rejected by the FSCS.

Claims have been paid by the FSCS as follows:

GBP	£1,487,119
EUR	€2.958.764
USD	\$1,657,746

4.11 It should be noted that the payment figures vary because payments have been made in three currencies and because some customers had payments in more than one currency.

4.12 Further details on this matter can be found at: <https://www.fscs.org.uk/failed-firms/afx-markets/>.

4.13 Please note that the FSCS utilises the claim information collated by the Special Administrators as part of the process of assessing claims, and the Special Administrators will continue to assist the FSCS with ensuring the correct claims are processed as quickly as possible.

4.14 Please also note that where compensation is paid, the FSCS will be entitled to subrogate your claim and claim in the Special Administration for the whole of your debt irrespective of whether it is over the threshold of £85,000. The FSCS compensation rules, as set out in the FCA Handbook, require FSCS to share recoveries made with clients whose claims exceed £85,000 such that those clients are not made worse off as a result of having claimed FSCS compensation at this time.

**5 Special Administrators' Remuneration**

5.1 On 7 January 2020; 9 October 2020; and 7 April 2021 the basis of the Joint Special Administrators' fees was fixed in the Special Administration by the Creditors Committee by reference to the time properly spent by them and their staff in managing the Special Administration with a capped limit of £267,538. This followed the approval of the Proposals and remuneration set out at the client and creditor meeting held on 5 November 2019 and sanctioned by the Creditors Committee on 7



January 2020. On 6 April 2022, the Creditors Committee approved an increase in the Joint Special Administrators proposed fees to be capped at £324,538. On 12 April 2023, the Creditors Committee approved an increase in the Joint Special Administrators proposed fees to be capped at £363,538. On 7 October 2025 the Creditors Committee approved an increase in the Special Administrators proposed fees to be capped at £476,863 and a copy of that estimate is reproduced below:

Category of work	Estimated Number of Hours	Average blended charge out rate £	Estimated cost £
Administration (inc statutory compliance & reporting)	539.43	240.14	129,536.75
Realisation of assets	27.20	276.56	7,522.50
Creditors (claims & distributions)	1,357.55	227.08	308,266.25
Investigations	106.70	160.71	17,147.50
Case specific matters (where applicable)	53.00	272.53	14,390.00
<b>Total estimated fees</b>	<b>2,083.88</b>	<b>228.83</b>	<b>£476,863</b>

5.2 Attached at Appendix B is a time analysis which provides details of the time costs incurred for this reporting period which total £32,367.50. This represents 135.80 hours at an average rate of £238.35 per hour. The time analysis has been broken down between time spent in dealing with "Client" matters and "General" matters and is set out as follows:

<u>Name</u>	<u>Time Costs</u>	<u>Hours</u>	<u>Average rate p/h</u>
Client Administration	£27,750.00	116.30	£238.61
General Administration	£ 4,617.50	19.50	£236.79
	-----	-----	-----
Total	£32,367.50	135.80	£238.35

5.3 Also attached at Appendix C is a cumulative Time Analysis for the period from 27 August 2019 to 26 February 2026 which provides details of the time costs incurred since our appointment. The cumulative time costs incurred to date are £405,860.50 and this represents 1,790.38 hours at an average rate of £226.69 per hour. The time analysis has been broken down between time spent in dealing with "Client" matters and "General" matters and is set out as follows:

<u>Name</u>	<u>Time Costs</u>	<u>Hours</u>	<u>Average rate p/h</u>
Client Administration	£316,978.75	1,381.75	£229.40
General Administration	£ 88,881.75	408.63	£217.51
	-----	-----	-----
Total	£405,860.50	1,790.38	£226.69

5.4 To date, £371,038.00 has been paid on account of these time costs.

5.5 At the date of this report, we would confirm that our revised fees estimate for the Administration remains unchanged and we currently anticipate that the total amount that will be paid to our firm in respect of the time costs incurred will be £476.863.



5.6 We do not anticipate that any further approval will be necessary following the revision of our previous estimate, in order to conclude the Administration. However, if we anticipate that it may be necessary to seek further approval to this revised estimate in due course then we will notify creditors accordingly should this happen and seek such approval from the Creditors Committee.

5.7 We will also update creditors on the anticipated total amount that will be paid to our firm in respect of the revised fees estimate in our next progress report. Given the current revision of our anticipated costs and the ongoing work in the Special Administration, it is difficult at this time to accurately report the anticipated payment to our firm, other than it will not exceed the cap of our my revised estimate without further approval from the creditors Committee.

A copy of 'A Creditors' Guide to Administrators' Fees' is available on request or can be downloaded from

<https://www.r3.org.uk/technical-library/england-wales/technical-guidance/fees/more/29113/page/1/administration-a-guide-for-creditors-on-insolvency-practitioner-fees/>

5.8 Attached at Appendix D is additional information in relation to the Administrators' fees, expenses and the use of subcontractors and other professional advisers.

## 6 Creditors' Rights

6.1 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 Administrators provide further information about their remuneration or expenses (other than pre-administration costs) which have been itemised in this progress report.

6.2 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 Administrators' remuneration is inappropriate and/or the remuneration charged or the expenses incurred by the Special Administrators, as set out in this progress report, are excessive.

## 7 Ending the Special Administration

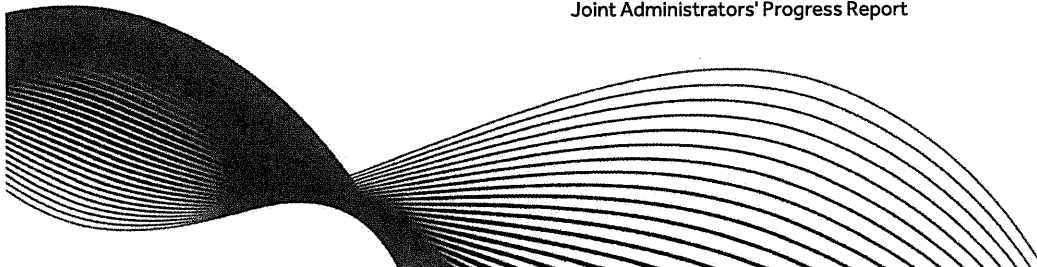
7.1 Administrations under the Insolvency Act would normally automatically end after one year. As this is a Special Administration, under the Regulations the case will continue until the Joint Special Administrators have completed their duties, allowing the Company's clients and creditors to prove and receive a distribution as appropriate in the Special Administration, rather than in a subsequent liquidation.

7.2 Once the Special Administration is concluded the Special Administrators can exit either by filing a notice of the Company's dissolution at Companies House or by applying to the Court for a Court Order ending the Special Administration and terminating the Special Administrators appointment.

7.3 On present information the expected exit route will be to file a notice of the Company's dissolution once all distributions have been made, and all statutory obligations completed.

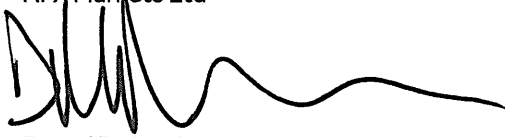
7.4 The Special Administrators' decision will be based on the most appropriate and cost-effective route in the circumstances at the relevant time.

7.5 It may be necessary to make a separate application to Court relating to the distribution of the client pool.



- 7.6 At this stage we are unable to estimate when the Special Administration will be concluded as this will be wholly dependent upon the distribution of funds to clients and, potentially, to the unsecured creditors.
- 7.7 The Special Administrators will be discharged from liability under Paragraph 98(3) of Schedule B1 to the Insolvency Act 1986 immediately upon their appointment as Special Administrators ceasing to have effect.
- 8 **Next Report**
- 8.1 The Special Administrators are 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.

For and on behalf of  
AFX Markets Ltd



Daniel Richardson  
Joint Special Administrator

### Appendix A

Receipts and Payments Account from 27 August 2025 to 26 February 2026 together with a cumulative Receipts and Payments Account from 27 August 2019 to 26 February 2026

	Statement of Affairs	Client Account from 27.08.2025 to 26.02.2026	General Account from 27.08.2025 to 26.02.2026	Total From 27.08.2019 to 26.02.2026
	£	£	£	£
<b>RECEIPTS</b>				
Bardays Bank Client Monies	432,131.00	0.00	0.00	1,061,093.72
Nat West Markets	608,893.00	0.00	0.00	531,891.58
Swissquote	Uncertain	0.00	0.00	0.00
AFX Capital Markets Ltd	Uncertain	0.00	0.00	0.00
Paysafe - Skrill/Neteller		0.00	0.00	30,500.55
Safecharge Limited		0.00	0.00	9,883.15
Gross Bank Interest		8,462.51	0.00	57,105.78
Furniture & Equipment	3,323.00	0.00	0.00	2,691.66
Tax Refund		0.00	80.71	80.71
Gross Bank Interest		0.00	3,260.43	34,828.80
Petty Cash		0.00	0.00	124.63
CG&Co - Payment of Expenses		0.00	0.00	3,351.60
		<b>8,462.51</b>	<b>3,341.14</b>	<b>1,731,552.18</b>
<b>PAYMENTS</b>				
Client Accounts *Open	(765,711.00)	0.00	0.00	0.00
Client Accounts *Closed*	Uncertain	0.00	0.00	0.00
Office Holders Fees- Client		33,000.00	0.00	296,922.05
Legal Fees		0.00	0.00	57,777.50
Postage & Stationery		1,096.84	0.00	1,096.84
Corporation Tax		5,299.25	0.00	10,916.71
Special IT Provider		0.00	0.00	2,290.60
Specific Bond		0.00	0.00	1,100.00
Office Holders Fees - General		0.00	5,000.00	74,115.95
Committee Expenses		0.00	0.00	178.50
Agents/Valuers Fees		0.00	0.00	4,057.52
Legal Fees		0.00	0.00	175,447.51
Corporation Tax		0.00	2,740.25	5,559.37
Couriers		0.00	0.00	110.00
Room Hire		0.00	0.00	360.00
Travel & Accomodation		0.00	0.00	1,903.70
Storage Costs		0.00	146.67	146.67
Re-Direction of Mail		0.00	0.00	211.00
Statutory Advertising		0.00	0.00	219.00
Insurance of Assets		0.00	0.00	168.00
Bank Charges		0.00	0.00	60.60
Redundancy Payments Service		0.00	5,924.25	5,924.25
Employee Arrears/Pay	(3,200.00)	0.00	0.00	0.00
Trade & Expense Creditors	(38,356.00)	0.00	0.00	0.00
Employees	(11,319.00)	0.00	0.00	0.00
HM Revenue & Customs - VAT	(885.00)	0.00	0.00	0.00
HM Revenue & Customs - Corp Tax	(209,655.00)	0.00	0.00	0.00
Ordinary Shareholders	(567,470.00)	0.00	0.00	0.00
		<b>39,396.09</b>	<b>13,811.17</b>	<b>638,565.77</b>
<b>Balance in Hand as at 26 February 2026</b>				<b>1,092,986.41</b>
<b>Comprised as follows:</b>				
VAT to be reclaimed				7,819.37
Client Account Funds				782,477.71
General Account Funds				302,689.33
				<b>1,092,986.41</b>

Appendix B

Time Analysis for the Period from 27 August 2025 to 26 February 2026

Time Entry - Detailed SIP9 Time & Cost Summary - Client Administration

Classification of Work Function	Partner	£	Manager	£	Assistants & Support Staff	£	Total Hours	Time Cost (£)	Avg Hourly Rate (£)
504 : Statutory Reporting to Creditors	5.50	1,650.00	13.60	3,060.00	0.00	0.00	19.10	4,710.00	246.60
505 : Report / Secured Creditor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
600 : Case Specific	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
700 : Formalities	2.20	660.00	4.10	922.50	2.40	240.00	8.70	1,822.50	209.48
701 : Strategy (Incl Sales)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Admin &amp; Planning</b>	<b>7.70</b>	<b>2,310.00</b>	<b>17.70</b>	<b>3,982.50</b>	<b>2.40</b>	<b>240.00</b>	<b>27.80</b>	<b>6,532.50</b>	<b>234.98</b>
500 : Preferential Creditors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
501 : Unsecured Creditors	17.10	5,130.00	70.60	15,885.00	0.00	0.00	87.70	21,015.00	239.62
502 : Employee Matters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
503 : Committee Report & Meeting	0.30	90.00	0.50	112.50	0.00	0.00	0.80	202.50	253.13
<b>Creditors</b>	<b>17.40</b>	<b>5,220.00</b>	<b>71.10</b>	<b>15,997.50</b>	<b>0.00</b>	<b>0.00</b>	<b>88.50</b>	<b>21,217.50</b>	<b>239.75</b>
201 : CDDA Reports	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Investigations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
202 : Pursuing Antecedent Transactions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
302 : Property	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
304 : Plant & Machinery / Motor Vehicles	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
306 : Other Assets	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Realisation of Assets	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Hours</b>	<b>25.10</b>	<b>7,530.00</b>	<b>88.80</b>	<b>19,980.00</b>	<b>2.40</b>	<b>240.00</b>	<b>116.30</b>	<b>27,750.00</b>	<b>238.61</b>

Time Entry - Detailed SIP9 Time & Cost Summary - General Administration

Classification of Work Function	Partner	£	Manager	£	Assistants & Support Staff	£	Total Hours	Time Cost (£)	Avg Hourly Rate (£)
504 : Statutory Reporting to Creditors	1.20	360.00	2.80	630.00	0.00	0.00	4.00	990.00	247.50
505 : Report / Secured Creditor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
600 : Case Specific	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
700 : Formalities	0.20	60.00	6.50	1,462.50	0.80	80.00	7.50	1,602.50	213.67
701 : Strategy (Incl Sales)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Admin &amp; Planning</b>	<b>1.40</b>	<b>420.00</b>	<b>9.30</b>	<b>2,092.50</b>	<b>0.80</b>	<b>80.00</b>	<b>11.50</b>	<b>2,592.50</b>	<b>225.43</b>
500 : Preferential Creditors	0.70	210.00	3.90	877.50	0.00	0.00	4.60	1,087.50	236.41
501 : Unsecured Creditors	2.00	600.00	0.50	112.50	0.00	0.00	2.50	712.50	285.00
502 : Employee Matters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
503 : Committee Report & Meeting	0.30	90.00	0.60	135.00	0.00	0.00	0.90	225.00	250.00
<b>Creditors</b>	<b>3.00</b>	<b>900.00</b>	<b>5.00</b>	<b>1,125.00</b>	<b>0.00</b>	<b>0.00</b>	<b>8.00</b>	<b>2,025.00</b>	<b>253.13</b>
201 : CDDA Reports	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Investigations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
202 : Pursuing Antecedent Transactions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
302 : Property	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
304 : Plant & Machinery / Motor Vehicles	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
306 : Other Assets	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Realisation of Assets	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Hours</b>	<b>4.40</b>	<b>1,320.00</b>	<b>14.30</b>	<b>3,217.50</b>	<b>0.80</b>	<b>80.00</b>	<b>19.50</b>	<b>4,617.50</b>	<b>236.79</b>

Appendix C

Cumulative Time Analysis for the Period from 27 August 2019 to 26 February 2026

Time Entry - Cumulative Detailed SIP9 Time & Cost Summary - Client Administration

Classification of Work Function	Partner	Manager	Other Senior Professionals	Assistants & Support Staff	Assistant Manager	Total Hours	Time Cost (£)	Avg Hourly Rate (£)	Hours Cumulative (POST Only)	Costs Cumulative (POST Only)
504 : Statutory Reporting to Creditors	26.20	104.45	0.00	0.00	0.00	130.65	31,361.25	240.04	130.65	31,361.25
505 : Report / Secured Creditor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
600 : Case Specific	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
700 : Formalities	2.20	14.20	0.00	2.40	0.00	18.80	4,095.00	217.82	18.80	4,095.00
701 : Strategy (incl Sales)	27.70	0.00	0.00	0.00	0.00	27.70	8,310.00	300.00	27.70	8,310.00
<b>Admin &amp; Planning</b>	<b>56.10</b>	<b>118.65</b>	<b>0.00</b>	<b>2.40</b>	<b>0.00</b>	<b>177.15</b>	<b>43,766.25</b>	<b>247.06</b>	<b>177.15</b>	<b>43,766.25</b>
500 : Preferential Creditors	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
501 : Unsecured Creditors	123.60	943.10	0.00	73.00	0.00	1,139.70	256,577.50	225.13	1,139.70	256,577.50
502 : Employee Matters	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
503 : Committee Report & Meeting	11.10	30.00	0.00	0.00	0.00	41.10	10,080.00	245.26	41.10	10,080.00
<b>Creditors</b>	<b>134.70</b>	<b>973.10</b>	<b>0.00</b>	<b>73.00</b>	<b>0.00</b>	<b>1,180.80</b>	<b>266,657.50</b>	<b>225.83</b>	<b>1,180.80</b>	<b>266,657.50</b>
201 : CDDA Reports	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Investigations</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
202 : Pursuing Antecedent Transactions	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
302 : Property	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
304 : Plant & Machinery / Motor Vehicles	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
306 : Other Assets	16.00	7.80	0.00	0.00	0.00	23.80	6,555.00	275.42	23.80	6,555.00
<b>Realisation of Assets</b>	<b>16.00</b>	<b>7.80</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>23.80</b>	<b>6,555.00</b>	<b>275.42</b>	<b>23.80</b>	<b>6,555.00</b>
<b>Total Hours</b>	<b>206.80</b>	<b>1,099.55</b>	<b>0.00</b>	<b>75.40</b>	<b>0.00</b>	<b>1,381.75</b>	<b>316,978.75</b>	<b>229.40</b>	<b>1,381.75</b>	<b>316,978.75</b>

Time Entry - Cumulative Detailed SIP9 Time & Cost Summary - General Administration

Classification of Work Function	Partner	Manager	Other Senior Professionals	Assistants & Support Staff	Assistant Manager	Total Hours	Time Cost (£)	Avg Hourly Rate (£)	Hours Cumulative (POST Only)	Costs Cumulative (POST Only)
504 : Statutory Reporting to Creditors	19.90	85.35	0.00	0.00	0.00	105.25	25,173.75	239.18	105.25	25,173.75
505 : Report / Secured Creditor	0.00	2.10	0.00	0.00	0.00	2.10	472.50	225.00	2.10	472.50
600 : Case Specific	5.20	0.50	0.00	0.00	0.00	5.70	1,672.50	293.42	5.70	1,672.50
700 : Formalities	17.60	104.03	0.00	1.60	0.00	123.23	28,846.75	234.09	123.23	28,846.75
701 : Strategy (incl Sales)	4.00	0.00	0.00	0.00	0.00	4.00	1,200.00	300.00	4.00	1,200.00
<b>Admin &amp; Planning</b>	<b>46.70</b>	<b>191.98</b>	<b>0.00</b>	<b>1.60</b>	<b>0.00</b>	<b>240.28</b>	<b>57,365.50</b>	<b>238.74</b>	<b>240.28</b>	<b>57,365.50</b>
500 : Preferential Creditors	0.70	10.40	0.00	0.00	0.00	6.50	2,550.00	392.31	6.50	2,550.00
501 : Unsecured Creditors	5.20	33.15	0.00	2.50	0.00	40.85	9,268.75	226.90	40.85	9,268.75
502 : Employee Matters	0.40	2.50	0.00	0.00	0.00	2.90	682.50	235.34	2.90	682.50
503 : Committee Report & Meeting	1.80	1.60	0.00	0.00	0.00	3.40	900.00	264.71	3.40	900.00
<b>Creditors</b>	<b>8.10</b>	<b>47.65</b>	<b>0.00</b>	<b>2.50</b>	<b>0.00</b>	<b>53.65</b>	<b>13,401.25</b>	<b>249.79</b>	<b>58.25</b>	<b>13,401.25</b>
201 : CDDA Reports	2.70	47.50	0.00	56.50	0.00	106.70	17,147.50	160.71	106.70	17,147.50
<b>Investigations</b>	<b>2.70</b>	<b>47.50</b>	<b>0.00</b>	<b>56.50</b>	<b>0.00</b>	<b>106.70</b>	<b>17,147.50</b>	<b>160.71</b>	<b>106.70</b>	<b>17,147.50</b>
202 : Pursuing Antecedent Transactions	1.70	0.00	0.00	0.00	0.00	1.70	510.00	300.00	1.70	510.00
302 : Property	0.00	0.30	0.00	0.00	0.00	0.30	67.50	225.00	0.30	67.50
304 : Plant & Machinery / Motor Vehicles	0.00	0.10	0.00	0.00	0.00	0.10	22.50	225.00	0.10	22.50
306 : Other Assets	1.00	0.30	0.00	0.00	0.00	1.30	367.50	282.69	1.30	367.50
<b>Realisation of Assets</b>	<b>2.70</b>	<b>0.70</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>3.40</b>	<b>967.50</b>	<b>284.56</b>	<b>3.40</b>	<b>967.50</b>
<b>Total Hours</b>	<b>60.20</b>	<b>287.83</b>	<b>0.00</b>	<b>60.60</b>	<b>0.00</b>	<b>408.63</b>	<b>88,881.75</b>	<b>217.51</b>	<b>408.63</b>	<b>88,881.75</b>



**Appendix D**

**Additional Information in Relation to the Joint Administrators' Fees, Expenses & the use of Subcontractors Staff Allocation and the Use of Subcontractors**

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 Administrator or Assistant. 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.

We have not utilised the services of any subcontractors in this case.

**Professional Advisors**

On this assignment we have used the professional advisors 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 Advisor	Basis of Fee Arrangement
DrydensFairfax Solicitors (legal advice)	Hourly rate and disbursements
AUA Insolvency Risk Services] (insurance)	Set Premium Costs
GARC Limited (Collection of assets & disposal advice; IT Services)	Hourly rate and disbursements
Humphrey & Gray (Property Maintenance)	Set Fee
My Tienda (Website Agents)	Set Fee
Trowers & Hamlins LLP (legal advice)	Hourly rate and disbursements

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.

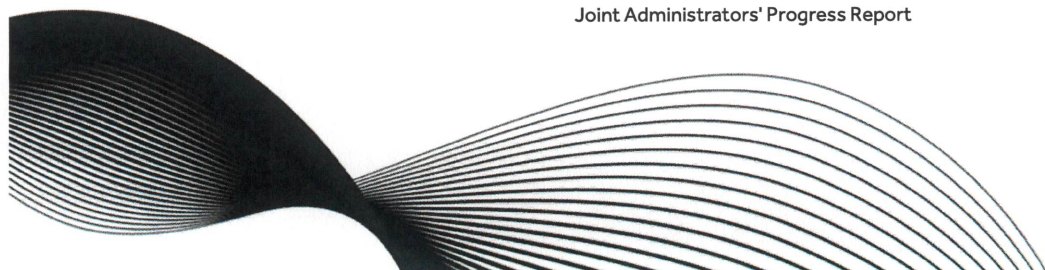
**Joint Special Administrators' Expenses**

The estimate of expenses which were anticipated in the Special Administration was provided to creditors when the basis of our fees was approved. The table below compares the anticipated costs against those incurred to date.

**Category 1 expenses**

These expenses do not require prior approval by creditors. The type of expenses that may be charged to a case as a Category 1 expense generally comprise of external supplies of incidental services specifically identifiable to the case, such as postage, case advertising, invoiced travel and external printing, external room hire and external storage costs. Also chargeable, will be any properly reimbursed expenses incurred by personnel in connection with the case. These expenses may include expenses which are payments first met by an office holder and then reimbursed from the estate.

Expense	Estimated overall cost £	Paid in Prior Period £	Paid in the period covered by this report £	Incurred but not paid to date £
Agent's fees & expenses	4,057.52	4,057.52	0.00	0.00
Legal fees & expenses*	300,000.00	249,465.01	0.00	41,565.00
Statutory advertising	219.00	219.00	0.00	0.00
Specific Penalty Bond	1,100.00	1,100.00	0.00	0.00



Insurance	168.00	168.00	0.00	0.00
External meeting room hire	360.00	360.00	0.00	0.00
Re-direction of mail	211.00	211.00	0.00	0.00
Travel & Accommodation	1,903.70	1,903.70	0.00	0.00
External Web Hosting	2,290.60	2,290.60	0.00	0.00
Committee Expenses	178.50	178.50	0.00	0.00
Couriers	110.00	110.00	0.00	0.00
Postage & Stationery	Uncertain	0.00	1,096.84	0.00
Bank Charges	60.60	60.60	0.00	0.00
Storage Costs	0.00	146.67	0.00	0.00
Corporation Tax	Uncertain	11,577.70	8,039.50	0.00

\* It should be noted that the anticipated legal fees and expenses have increased as this now takes into account the proposed costs of instructing solicitors and Counsel for an Application to Court in respect of the proposed strategy for setting the final "Bar date" and formulating the conclusion of the Special Administration. It is anticipated that these costs will be in the region of £35,000.

### *Category 2 expenses*

These expenses 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 therefore include payments to associates of the office holder or shared or allocated costs that can be allocated to the appointment on a proper and reasonable basis. Category 2 expenses have not been sought.

### **Charge-Out Rates**

A schedule of CG&Co charge-out rates as agreed with the FCA in respect of this Special Administration is shown below. Please note this firm records its time in minimum units of 6 minutes

	(Per hour) £
Partner	300.00
Manager	225.00
Assistant Manager	125.00
Administrator	100.00