

Chichester

Exchange Building
St John's Street
Chichester
West Sussex
PO19 1UP

Tel: 01243 531234

Safeguarding client money and assets

Introduction

This document explains how Thesis Asset Management Limited (Thesis) looks after client money and other assets entrusted to us by our clients.

Client money and assets

Client money is money that we receive or hold for you, and which is subject to the FCA's client money rules. Client assets, also known as safe custody assets, include investments and other assets that we hold or arrange to hold on your behalf.

We do not use client money to fund our business or lend it to other clients. Client money is held on trust and kept separate from our own money in accordance with the rules of the Financial Conduct Authority (FCA), which regulates us.

FCA rules

The FCA grants permissions to regulated firms and maintains the Financial Services Register. You can use the Register to check a firm's regulatory status, permissions and any requirements that apply to it at www.fca.org.uk/register.

The rules relating to the custody and safeguarding of client money and client assets are contained in the FCA's Client Assets sourcebook (CASS). They are designed to protect clients' ownership rights and reduce the risk of loss or misuse of client money and assets.

Money on deposit

We pool your money with that of other clients and place it with banks, credit institutions or, where permitted, qualifying money market funds. We exercise due skill, care and diligence when selecting and reviewing the organisations we use and consider, among other matters, their financial strength, regulatory status and the need for appropriate diversification. Our arrangements are governed by our bank and money market selection policy and are kept under review.

We make and retain records of our selection and periodic review of banks and qualifying money market funds in accordance with the FCA's CASS record-keeping requirements.

Nominee holdings

Client assets held through our nominee company are registered in the name of Thesis Nominees Limited. This is a non-trading company, wholly owned by Thesis, which is used to keep client assets separate from our own assets.

If Thesis or a third-party custodian were to fail and there were an unresolved shortfall in a pooled asset holding, clients could be affected by that shortfall. To reduce this risk, we carry out ongoing due diligence and review of our custodian arrangements, including financial resources, operational and security controls, insurance, risk management and data protection.

Reconciliations

The FCA requires us to maintain records and accounts that enable us to distinguish assets and money held for one client from those held for other clients and from our own assets and money. We carry out reconciliations to check the accuracy of our records against relevant third-party records.

If an asset reconciliation identifies a discrepancy, we investigate it promptly and take the steps required by the FCA's CASS rules to resolve it. Where there is an unresolved shortfall, we take the required steps to protect clients while the position is being resolved.

If a client money reconciliation identifies a discrepancy, we investigate the reason and take the action required by the CASS rules, including paying any required shortfall into a client bank account and withdrawing any excess within the applicable timeframe.

Compensation

Client money placed with a bank, building society or credit union is exposed to the financial standing of that institution. If a UK-authorized deposit taker fails, Financial Services Compensation Scheme (FSCS) deposit protection may apply.

The current FSCS deposit protection limit is up to £120,000 per eligible person, per authorised firm. Where money is held on your behalf in a client or pooled account, the FSCS may treat you as the beneficial owner for deposit protection purposes. The limit generally takes account of any other eligible

deposits you hold with the same bank or banking group.

Separately, if Thesis were to fail and could not meet an eligible claim relating to protected investment business, the FSCS may pay compensation of up to £85,000 per eligible person, per firm. FSCS investment protection does not cover losses arising simply because an investment has fallen in value or performed poorly. Eligibility and the amount of compensation payable are determined by the FSCS. Further information is available at www.fscs.org.uk.

The Thesis group also maintains professional indemnity insurance (PII). The level of cover and the arrangements supporting it are reviewed regularly.

Oversight

Thesis has governance and oversight arrangements for client money and assets in accordance with the FCA's CASS requirements. Responsibility for CASS compliance and operational oversight is allocated within the firm, supported by specialist staff. Information on our handling of client assets and money is reported to senior management and the board as part of our governance arrangements.

Independent audit

Thesis appoints an external auditor to report on its client asset arrangements in accordance with FCA requirements. The auditor's client assets report includes an opinion on whether we have maintained systems adequate to enable us to comply with the applicable client money and custody rules.

This update is for information only and should not be considered advice to invest or to use our services. This information is not a substitute for professional advice based on your own circumstances. Issued by Thesis Asset Management Limited, Exchange Building, St John's Street, Chichester PO19 1UP. Authorised and regulated by the Financial Conduct Authority. October 2026.