CURTIS BANKS

FACT SHEET

INVESTMENT ORDER TRANSMISSION POLICY

APPROVED FOR CLIENT USE | DECEMBER 2025

Curtis Banks does not undertake investment transactions itself but instead receives instructions from clients or their appointed advisers and processes those instructions via the relevant investment firm or provider. When we receive an instruction to buy or sell investments on behalf of a client's plan, we shall do so in accordance with this policy.

Generally

On receipt of an instruction we shall ask the person giving the instruction (once we have verified they have appropriate authorisation to do so) where they wish the order to be executed.

Receipt of investment order

Where the type of financial instrument to be dealt in must be acquired via an investment firm under our terms and conditions for the SIPP, we will direct the adviser or client to contact the investment firm appointed to the SIPP (if any) to effect the instruction.

If no investment firm account has been set up within the SIPP, we will arrange to open such an account. The instruction cannot be effected until the account is opened. Once opened it is the adviser's or the client's responsibility to place the instruction directly with the investment firm.

Check that the investment meets our Schedule of Allowable Investments

Where we have not previously checked that an investment is allowable, we will initiate the investigation within three working days of receipt of the instruction.

If the check cannot be concluded within three working days and consequently the instruction has not been transmitted, we will inform the adviser or client of the reason for the delay and confirm that the instruction cannot currently be transmitted for execution.

Should the investment not be an allowable investment, we will inform the adviser or client of the reasons for this on conclusion of our assessment.

Transmission of order

We will transmit the order to the chosen investment firm or provider of the client's choosing, including any further information that may be required by the chosen investment firm or provider. We will transfer any settlement funds where appropriate.

We will contact the adviser or client where we do not receive sufficient information to transmit the order, including for the following reasons:

- no chosen investment firm or provider;
- adviser fee or commission terms have not been specified by the adviser (where required on the application form);
- income or accumulation units not specified;

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- application form for the investment has not been provided;
- funds available for investment are less than the order

This contact will be on the day we become aware that the required information is missing. Where no contact can be made, and we do not reasonably believe that contact can be made within one week from receipt of the instruction, we will write to the client or adviser to inform them that we are unable to carry out the trade until such time that we have received the missing information.

Order of transmitting instructions

In all cases the orders will be transmitted for execution in a timely manner and always with due care and attention. This will not always be on the day of receipt, but will be by the end of the third working day after receipt of a valid and complete instruction.

Investment instructions will be placed in a queue and transmitted for execution in the order that they are received. An instruction will not be placed into this queue until such time as all information required to transmit that instruction for execution has been received and any allowability checks have been satisfactorily concluded.

Where an instruction is received for an investment that has an imminent closing date or other similar deadline, consideration will be given to prioritising this deal, but not ahead of any orders received for the same investment already in the queue. This prioritisation will only occur if we consider there to be no detrimental impact to other investment instructions already queued.

Orders will generally be transmitted by post unless alternative instructions are provided by the client or adviser. This will mean that the time the order is executed at the venue of the client's choosing will not be the same day that we transmit the order but at least one working day later, depending on the time it takes to arrive at the chosen venue and the chosen venue's own execution policy.

Following receipt of the order by your chosen investment firm or provider, both Curtis Banks and/or clients may be required to provide additional AML documentation or other information before the transaction is placed. This can further extend the time until the order is executed.

Important points to consider

We recommend that clients seek financial advice from an FCA authorised adviser on any investments (including potential investments and disinvestment of existing investments) within their plan.

The value of pension funds may fall as well as rise. Your money is tied up until you take your benefits. Benefits can generally be taken any time after age 55, although this is due to increase to 57 in 2028.

Contact Details

If you'd like to speak to us about anything on this fact sheet, please contact us on:
T 0370 414 7000
We may record and monitor calls. Call charges will vary.
E enquiries@curtisbanks.co.uk

If you wish to contact a specific team, please use the search box on our Contact Us page on our website. You can also use our virtual assistant at the bottom right corner of our web page to help resolve a range of common queries.

For literature in alternative formats, such as Braille, large print, audio or E-text, please call us on 0370 414 7000, or via the Typetalk service on 18001 0370 414 7000.