

## Information on our Complaints Procedure

---

### 1. Purpose

---

You expect a first-class service from us and that is what we aim to provide. However, on occasion you may not be happy with our service or a financial product. This may be because of the nature of the service or product or there may be more to it. If there is a problem, or you are not happy with something, please tell us and we will try to put things right. If you don't understand something, please ask us for an explanation. If we understand the problem or any concerns you may have, we can often explain it in a clearer way or resolve it quickly and easily.

If you are not happy with the answers we give you, you may need to make a complaint.

These notes explain how we deal with complaints. If you have any questions about the content please contact our Compliance Officer, Ralph Sanders.

---

### 2. What is a complaint?

---

A complaint is any expression of dissatisfaction by, or on behalf of, a client, whether oral or written and whether justified or not. Some complaints can be dealt with relatively informally and quickly. But, if it involves allegations of financial loss, material inconvenience or distress it will have to go through our "regulated" complaints process.

---

### 3. Who can complain?

---

You can complain or someone else can complain on your behalf. If someone does complain on your behalf, we will require your written permission to allow us to deal with them.

---

### 4. What do we do if we receive a complaint?

---

We refer all our regulated complaints to our Compliance Officer for independent investigation. We will try to sort it out quickly and, where possible, within three business days. If we cannot, we will keep you informed of progress.

We aim to:

- a) Establish whether you are what is called "an eligible complainant". This means whether you have the right to refer your case to the Financial Ombudsman Service. We will tell you if we believe that you are an eligible complainant. However, even if we think you are not, it is for the Ombudsman to decide who is and is not an eligible complainant;
- b) Investigate your complaint competently, diligently and impartially;
- c) Assess your concerns fairly, consistently and promptly;
- d) Reply to the complaint as quickly as possible;
- e) Inform you of your rights.

If the complaint relates to another company, we will pass your complaint on to that company and tell you what we have done. If it involves us and another company, we will liaise with the other company to resolve the problem and keep you informed of what we are doing.

---

### 5. Acknowledging your complaint

---

We will acknowledge your complaint in writing within five business days. We will explain our understanding of your complaint and invite you to confirm (if our understanding is incorrect) the nature of your complaint.

The acknowledgement letter will outline the results of the investigation if it has been completed by then. If it has not been completed, we will tell you:-

- a) if the investigation is not completed within a reasonable time following receipt of your complaint, you will be informed of the reasons for the delay; and

- b) if the investigation is not completed within eight weeks following the initial receipt of your complaint, you will be informed of what further action you may take; and
- c) on completion of the investigation you will be informed of the outcome and the options available to you.

---

## 6. Progress of our investigation

---

If we have not completed our investigation within eight weeks, we will write to you informing you of the reasons for further delay. If you are an eligible complainant and are not satisfied with progress, you may refer the complaint to the Financial Ombudsman Service. The letter will include the name, address, website and telephone number of the Ombudsman and a leaflet about the Ombudsman's arrangements.

---

## 7. Conclusion of our investigation

---

On completion of the investigation, we will write you a "conclusion" letter advising you of the outcome of the investigation and the nature and terms of any proposed settlement. If you remain dissatisfied with the outcome, you may refer the matter to the Financial Ombudsman Service or the Pensions Ombudsman. Both are free of charge. If the complaint is about a MiFID instrument, we will tell you about your right to take court action through the civil courts. We will tell you if you have rights to complain under more than one system.

---

## 8. What if you are still not happy with what we have done?

---

If you are unhappy with anything and we have not been able to resolve it through our complaints procedure, one of the following organisations may be able to help.

If you are an eligible complainant and intend to refer the matter to the Financial Ombudsman Service, you must do this within six months of our conclusion letter we send you or you may lose the right to do so. If you do not refer your complaint in time, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances; for example, if the Ombudsman believes that the delay was because of exceptional circumstances. Our letter will point this out to you. However, it is the Ombudsman who decides what exceptional circumstances are.

If the matter is about pension administration, you may have the right to refer your complaint to the Pensions Ombudsman.

### Organisations that may be able to help you

<p>Financial Ombudsman Service Exchange Tower London E14 9SR</p> <p>Tel: 0800 023 4567 (free on mobile phones and landlines)</p> <p><a href="http://www.financial-ombudsman.org.uk/">http://www.financial-ombudsman.org.uk/</a></p>	<p>The Pensions Ombudsman 10 South Colonnade Canary Wharf E14 4PU</p> <p>Tel: 0800 917 4487 (free on mobile phones and landlines)</p> <p><a href="http://www.pensions-ombudsman.org.uk">http://www.pensions-ombudsman.org.uk</a></p>
---	--