

Complaints Policy

Introduction

We are authorised and regulated by the Financial Conduct Authority ("FCA") and are required to have and operate an appropriate and effective internal complaint handling procedures. This policy is issued to new clients (as an appendix in the Investment Management Agreement) and whenever we receive a complaint.

Definition of a complaint

A complaint is any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

Our Approach

How to complain

If the client is unhappy with any aspect of the services we offer and wishes to complain the client should write, in the first instance, to the Compliance Officer. It is preferable if complaints are in writing, however oral complaints made to the client's investment manager, or any other employee will be treated in the same way.

How your complaint will be handled

When a complaint is received, we will promptly send the client a written acknowledgement providing the reassurance that the complaint has been received and is being dealt with. We will designate a senior member of staff, not involved in the management of the client's portfolio, to oversee the investigation surrounding the complaint. The complaint will be investigated promptly and fairly.

Complaints resolved by close of the third business day

If the complaint can be resolved by the close of business on the third business day following the day on which it is received, we will issue the client with a written response which refers to the fact that the client has made a complaint and informs them that we now consider the complaint to have been resolved. This response will also inform the client that if they subsequently decide that they are dissatisfied with the resolution to the complaint, they may be able to refer the complaint to the Financial Ombudsman Service.

Final response within eight weeks

If the complaint cannot be settled within three business days, we will ensure that the client is kept informed of any measures being undertaken to resolve the complaint and we will provide some indication of when we will correspond further with them. We aim to respond to the client with a formal response in no more than eight weeks. The final response will:

- Accept the complaint and, where appropriate, offer redress or remedial action; or
- Offer redress or remedial action without accepting the complaint; or

- Reject the complaint and give reasons for doing so and inform the client that if they remain dissatisfied with the final response, they may refer their complaint to the Financial Ombudsman Service.

Financial Ombudsman Service

The Financial Ombudsman Service contact details are as follows:

Address: The Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Helpline: 0800 023 4567

Email: complaint.info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk

Any referral to the Financial Ombudsman Service must be made within six months of the date of the final response.

Financial Services Compensation Scheme

The firm is covered by The Financial Services Compensation Scheme ("FSCS") which provides compensation to eligible claimants if an authorised financial services firm cannot meet its obligations. If the firm is declared in default or unable to pay what it owes to clients, the client may be entitled to compensation under the FSCS. For investment-related claims, the maximum amount currently covered is £85,000, although this limit may change from time to time.

The FSCS contact details are as follows:

Postal Address: The Financial Services Compensation Scheme
PO Box 300
Mitcheldean
GL17 1DY

Telephone: 0800 678 1100

Website: www.fscs.org.uk

Governance

Policy Ownership

The Compliance Officer is responsible for complaints, and any concerns should be raised to them.

Training

Staff are made aware of the complaints policy through refresher training and at onboarding.

Alison Fawcett
Compliance Officer and MLRO
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