

COMPLAINTS HANDLING PROCEDURES

This leaflet provides information on how we will act in the event that we receive a complaint from you. It describes the procedures, which are in accordance with the guidelines of our regulator, the Financial Conduct Authority, which we will follow.

Any complaint you have should be referred in the first instance to:

Mr Damian Aspin
Torevell & Partners
5 Oxford Court
Manchester
M2 3WQ
regulatory@torevellpartners.co.uk

Tel. 0161 281 6400

Immediately upon receipt of your complaint, our Compliance Officer, Damian Aspin, will determine whether you are an eligible complainant and whether your complaint is an eligible complaint. Where we are unable to determine your classification, we may contact you to obtain further information. Complainants who are not eligible complainants and complaints that are not eligible complaints will not be subject to all of these procedures.

Where our Compliance Officer has reasonable grounds to be satisfied that another firm may be solely responsible for your complaint, he may refer your complaint to the other firm. This referral will be made in writing and within a short time, typically five business days from the date of complaint. The Compliance Officer will inform you of his actions in writing and will include the other firm's contact details.

Where our Compliance Officer has reasonable grounds to be satisfied that another firm may be jointly responsible, he will follow the same procedure as set out above however, he will follow our normal complaints procedures in respect of the part of the complaint for which we are responsible.

If we are able to resolve your complaint (that is you and we agree to a resolution of your complaint) by the close of business on the third day after receipt of your complaint, your complaint will not be subject to all of our complaints procedures. Therefore, not all of the following will apply.

If we are not able to resolve your complaint by the close of business on the third business day after receipt of your complaint, your complaint will be subject to all of our complaints procedures as detailed below.

Within a reasonable timescale of receipt, typically five business days, our Compliance Officer or his nominee will send you a written acknowledgement of the complaint that will include:

- (i) the name of the Compliance Officer and contact details;
- (ii) a statement that a written report will follow once the investigation is complete;
- (iii) confirmation that, if your complaint has not been resolved within a reasonable timescale, typically four weeks of receipt, a holding letter will be sent to you that confirms why we are not yet in a position to resolve your complaint and setting a date by when we will make further contact;
- (iv) in the case of an oral complaint only, a statement of our understanding of the nature of your complaint and a request for you to confirm this in writing; and
- (v) a copy of these procedures.

The acknowledgement will only include sub-paragraphs (ii) to (iv) inclusive above where we have confirmed that you are an eligible complainant and that your complaint is an eligible complaint.

In the event that the investigation has not been completed and your complaint is not resolved within a reasonable timescale of receipt, typically four weeks, the Compliance Officer or his nominee will write to you explaining why the complaint investigation has not yet been completed and indicating the date by which it is expected we will write to you again. Where possible, we will make every effort to resolve your complaint within four weeks.

If the investigation has still not been completed after say eight weeks, we will send you a further letter stating that we are still not in a position to provide a final response, explaining the reasons for the delay and providing a further target date for resolution of your complaint. This letter will also advise you that, where you are an eligible complainant and have an eligible complaint, you have the right to refer the matter to the Financial Ombudsman Service (“FOS”) if you are dissatisfied with the delay. Where appropriate, we will also include a copy of the FOS explanatory leaflet “Your complaint and the Ombudsman”.

Once the investigation is complete, a final response letter will be sent by the Compliance Oversight Officer that will provide you with a summary of our investigation and our decision in the matter. This will also include, where you are an eligible complainant and have an eligible complaint, a copy of the FOS explanatory leaflet.

If at this stage you are dissatisfied with the outcome of our investigation, are an eligible complainant and have an eligible complaint, and wish to refer the matter to the FOS, you must do so within six months of the date of the final response letter or you may lose the right to refer the complaint.

We are also obliged to make regular reports to the Financial Conduct Authority detailing the number and breakdown of all complaints (eligible complaints received from eligible complainants) we have received during the previous six months including those that are still outstanding.