

INTERNAL COMPLAINTS PROCEDURE



Complaints

The definition of 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, which:

- a) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- b) relates to an activity of our firm, or of any other firm with whom we have some connection in marketing or providing financial services or products, which comes under the jurisdiction of the Financial Ombudsman Service".

Consumer awareness

A summary of our internal process for dealing with complaints promptly and fairly must be given to eligible complainants on request and when acknowledging a complaint.

Eligible complainants are:

- a private individual; or
- a business with a group annual turnover of less than €2 million euros; or
- a charity with annual income of less than £1 million; or
- a trustee of a trust with a net asset value of less than £1 million.



A complaint can be made via any reasonable means, including letter, telephone, email, and in person.

Complaints Procedures

It is the firm's policy to treat all complaints, whether regulated or not, according to the Complaints Procedures.

Receiving a complaint

All complaints, whether oral or written and made by or on behalf of a customer, must be referred immediately to the Compliance Officer, even if the complaint has already been resolved by an apology.

Any oral or written statement made by a client, which might be considered as a complaint, must be referred to the Compliance Officer so it can be determined whether it is a complaint or not.

Once it has been established if the matter is a complaint, the Compliance Officer will notify the Professional Indemnity Insurers in accordance with the terms and conditions of our policy.

The remaining sections apply only to complaints, which meet the following criteria:

- a) the complaint is made by or on behalf of an eligible complainant;
- b) the complaint relates to a regulated activity of the firm; and
- c) the complaint involves an allegation that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- d) the complaint has not been resolved by close of the next business day following its receipt.

Any complaint resolved by the firm by close of business the following business day of its receipt, will still be investigated competently, diligently and impartially; be assessed fairly, consistently and promptly and; all relevant factors will be taken into account.

Acknowledging a complaint

The Compliance Officer will acknowledge the complaint in writing. The written acknowledgement will be issued promptly within five working days.

In relation to oral complaints, the written acknowledgement will set out the Compliance Officer's understanding of the complaint and will invite the complainant to contact the Compliance Officer if their understanding is incorrect.

The acknowledgment letter will outline the result of the investigation if this has been completed. If the investigation has not been completed, the acknowledgement letter will confirm that the firm will:

- a) provide the complainant with regular updates on our progress; and
- b) advise them that if our investigation has not been completed within eight weeks of our receipt of the complaint, we will write to the complainant informing them why we are not yet in a position to resolve their complaint and provide details of their rights to refer the matter to the Financial Ombudsman Service; and
- c) advise them that on completion of our review, we shall write to the complainant informing them of the outcome.



A summary of our internal process for dealing with complaints promptly and fairly will be forwarded with the acknowledgment letter.

Investigating a complaint

Any investigation conducted will be fair, consistent, and will be dealt with promptly.

The Compliance Officer will investigate all complaints and may, where appropriate, consult the adviser or member of staff whose actions or omissions gave rise to the complaint issue(s) raised.

If the Compliance Officer is subject to the complaint, the investigation will then be conducted by a Senior Partner.

The investigation will include:

- a) a review of the relevant client file; and
- b) a review of any information and/or documents submitted by the complainant (including any standard questionnaires); and
- c) contact with the relevant provider(s), if relevant.

If remedial action and/or redress is to be offered, the type of remedial action and the level of redress must be fair and appropriate.



Resolving a complaint

Following the completion of the investigation, the Compliance Officer will issue a written Final Response letter to the complainant.

The Final Response letter will be fair, clear and not misleading and will provide the complainant with:

- a) details of the investigation; and
- b) the outcome of the investigation; and
- c) if relevant, any offer of remedial action(s) or the appropriate level of redress (or both), and the basis of calculation; and
- d) details of their right to refer the matter onto the Financial Ombudsman Service (FOS) and advise that this must be done within six months from the date of the Final Response letter, or they may lose that right; and
- e) contact details of the FOS.

A copy of the FOS's standard explanatory leaflet must be issued with the Final Response letter, unless provided earlier.

If the firm receives confirmation from the complainant that they are satisfied with the findings and outcome of the investigation and/or the redress being offered, the complaint will be considered to be closed by the Compliance Officer.

Where no confirmation has been received from the complainant within eight weeks of the firm's Final Response, the complaint will also be considered closed. However, should the complainant contact the firm after eight weeks, we will review any further correspondence accordingly.

Keeping a complainant informed

We will ensure that a complainant is regularly kept informed of our progress with regards to the investigation into their complaint.

Any progress updates will include:

- a) the reasons for any delay; and
- b) what further information / documents we require to resolve their complaint; and
- c) when they may expect to receive a further update / our Final Response letter.

We will work towards completing our investigation into a complaint within eight weeks of its receipt.

In the event that we have been unable to conclude our investigation within the eight week period, we will write to the complainant, informing them of the reasons for the delay and that if the complainant is not satisfied with our progress, the complainant may refer the matter to the FOS. A copy of the FOS's standard explanatory leaflet must be issued with the eight week response letter.

Financial Ombudsman Service (FOS)

If a complaint is referred to the FOS, the firm will fully co-operate with them and comply promptly with any settlement and awards made by it. The firm agrees to be bound by any awards made by the Ombudsman. The firm undertakes to pay promptly the fees levied by the FOS.



Referring a complaint to another firm

If a complaint is received whereby the firm has reasonable grounds to be satisfied that another firm is solely or jointly responsible for the issue(s) raised, the case will be referred promptly, in a durable medium, to that firm.

The firm will also inform the complainant promptly of the referral and provide them with the other firms contact details. If the firm is responsible on a joint basis, we will investigate those issue(s) in line with our normal procedures.

Record keeping

An entry of each complaint received will be made within the firms Complaints Register, which will be maintained at all times. The firm will retain a record of each complaint received for at least three years from the date the complaint is received.

Staff understanding

All staff (including all administration and secretarial staff) are to be given a copy of this document and to sign their acknowledgment of receipt, understanding and agreement to act within the requirements at all times.





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