

Private Investment Management

COMPLAINTS PROCEDURES FOR PIM CLIENTS

These procedures are written in accordance with the Financial Services Authority (“FSA”) Complaint Handling Rules and are designed to set out the procedures for our internal handling of complaints to ensure that they are fair, effective and timely. These procedures are required to be issued upon request and in the event of a client complaint.

If you have not already done so, we request that you put your complaint in writing and, for the avoidance of doubt, that you indicate it is a formal complaint.

In investigating the complaint we will retrieve the relevant documentation from our files and systems (including the telephone recording system). This material will be studied, in the context of your complaint, by an employee of sufficient competence who was not directly involved in the matter.

We will endeavour to respond to and resolve your complaint straight away, which we consider to be one business day from its receipt. However, we may need to carry out further internal investigations. Should these be required we will send you a **Notice of Investigation letter** within **5 working days** from receipt of your complaint.

The **Notice of Investigation letter** will include

- an explanation of why a different person is responding if it is not the person you addressed your complaint to;
- the name and job title of the individual handling your complaint;
- a timescale for when we will correspond further which will be no more than 4 weeks from the receipt of your complaint; and
- a copy of our complaint handling procedures.

In the unlikely event that our investigations require longer than **4 weeks** to complete, we will write to you to explain why we are not yet in a position to respond to your complaint and indicate when we will make further contact (this must be within **8 weeks** of the receipt of the complaint).

If after **8 weeks** we are still not in a position to make a response, we will write to you and give reasons for the delay and an indication of when we expect to provide a full response. At this point we must include details of the Financial Ombudsman Service (“FOS”), to which you can refer your complaint if you wish; a copy of the FOS’s explanatory leaflet would also be enclosed.

Once our investigations are complete we will write to you with our response. This will be either a **Final Response**, or an **Offer Letter**.

A **Final Response** will be sent to you when we believe we have fully addressed your complaint.

It must include

- notification that you may refer the complaint to the FOS if you remain dissatisfied with our final response and that you must do so within **6 months** (from the date of the final response); and
- a copy of the FOS explanatory leaflet.

An **Offer Letter** will be sent to you when we consider that you are entitled to some redress, and believe that we have fully addressed your complaint. This will include a page for you to state your acceptance and return to us. We will then forward the agreed redress in a **Final Response** letter.

We will consider a complaint closed once

- we have sent you a **Final Response**; or
- you have indicated in writing that you accept our offer or response; or
- you fail to respond to our correspondence within **8 weeks** from the date of our written response.

Contact details for your information:

<p>You can contact your fund manager</p> <p>⇒ in writing</p> <p>Newton Investment Management Limited 71 Queen Victoria Street London EC4V 4DR</p> <p>⇒ by phone</p> <p>020 7332 9000</p>	<p>The Financial Ombudsman Service can be contacted</p> <p>⇒ in writing</p> <p>Financial Ombudsman Service South Quay Plaza 183 Marsh Wall London E14 9SR</p> <p>⇒ by phone</p> <p>0845 080 1800</p>
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