

**LIONTRUST ASSET MANAGEMENT PLC:**

**COMPLAINT HANDLING PROCEDURES**

**1. Introduction**

Under the provisions of the Financial Services and Markets Act 2000 ('FSMA'), firms that are regulated by the Financial Conduct Authority ('FCA') are obliged to publish and have readily available a copy of their internal complaint handling procedures.

This leaflet therefore sets out Liontrust's procedures and relates to the FCA regulated firms within the Group – Liontrust Investment Partners LLP, Liontrust Fund Partners LLP.

You might like to note that if you have any complaint whatsoever about the service (or lack of it), or any other matter to do with Liontrust with which you are dissatisfied, you have the right to lodge a formal complaint about it.

**2. Can I Really Complain About Anything?**

Yes, you can make a complaint about anything that you think Liontrust has done (or has failed to do) with regard to your investment with the company.

**3. How Do I Make A Complaint?**

You can lodge your complaint by letter, telephone, e-mail, facsimile or in person at our offices. In accordance with DISP 1.3.7R Liontrust have nominated Martin Kearney (Chief Risk Officer) as the senior individual at Liontrust responsible for complaints handling, the relevant address and various numbers etc. are produced at the end of this document.

**4. How Will Liontrust Deal With My Complaint?**

(i) It will be investigated immediately by someone of sufficient competence who was not involved with the matters that gave rise to it.

(ii) Where we believe the complaint to be justified, we shall offer appropriate redress.

(iii) You will receive an initial acknowledgement of your complaint promptly after we have received it. This may offer at once a resolution which we hope would be acceptable to you.

(iv) If we are unable to offer immediately a resolution which we think will be acceptable to you, we shall send you a holding response, explaining why we are unable to offer a swift resolution and when we expect to write again (which must be before eight weeks have elapsed since receiving the complaint).

(v) If matters do become somewhat drawn out, then within eight weeks of our receiving your complaint, we shall send you a final response (see definition below), or a letter explaining why we are still not in a position to make such a response, giving reasons for the further delay and indicating when we expect to be able to do so.

(vi) You can refer your complaint to the Financial Ombudsman Service ("FOS") if you are dissatisfied with our final response or if we have failed to resolve your complaint within eight weeks of our receiving it and you are dissatisfied with the delay. We shall send you a copy of the FOS's explanatory leaflet with our final response.

## 5. Timing

The FCA places certain obligations on the firms that it regulates with regard to the timing of the handling of a complaint. These are more or less set out above, but to clarify matters, we are obliged to respond promptly to a complaint after receiving it. Similarly, we are obliged to send you a final response within eight (calendar) weeks of receiving your complaint or explain why we cannot yet do so. If the matter is still not resolved within eight weeks of receipt, we must explain to you why not and inform you that you have the right to complain direct to the Financial Ombudsman Service if you are unhappy with the reason for the delay.

However, there is also an obligation placed upon you to respond in a timely manner to us. What this means is that, if you take longer than a week to respond to any letter from us, we need not regard the period over a week as counting towards our own eight week obligation as described above.

## 6. Essential Definitions:

### Eligible Complainant:

- a private individual; or
- a business, which employs fewer than 10 persons and has a group annual turnover of less than £2 million at the time the complainant refers the complaint to the firm; or
- a charity, which has an annual income of less than £1 million at the time the complainant refers the complaint to the firm; or
- a trustee of a trust, which has a net asset value of less than £1 million at the time the complainant refers the complaint to the firm;

**and** who also satisfies all or any of the following additional criteria:

- he is or has been a customer of the firm;
- the complaint arises out of matters relevant to his being or having been a customer of the firm;
- he is the holder of units or shares in unit trusts or other collective investment schemes of which the firm is the manager or operator;
- he is the authorized representative of a person who would otherwise be an eligible complainant or would have been but is deceased.

[N.B. 'eligibility' in this context refers only to a complaint that can be referred to the Financial Ombudsman Service. Professional Clients and Eligible Counterparties do not qualify].

**Final Response:** A written response from the firm which:

- (a) accepts the complaint and, where appropriate, offers redress; or
- (b) offers redress without accepting the complaint; or
- (c) rejects the complaint and gives reasons for doing so;

and which informs the complainant that if he remains dissatisfied with the firm's response, he may now refer his complaint to the Financial Ombudsman Service and must do so within six months. This response would also include a copy of the FOS's explanatory leaflet. [The six months, incidentally, start from the date when we send you our final response].

We hope that these procedures are clear but if there is anything that is not, please do not hesitate to contact us:

Liontrust's address is 2, Savoy Court, London, WC2R 0EZ

Telephone Number: 020 7412 1700

Facsimile: 020 7412 1779

E-mail: [martin.kearney@liontrust.co.uk](mailto:martin.kearney@liontrust.co.uk) (Chief Risk Officer)