

AR COMPLAINTS POLICY & PROCEDURE

This document sets out the procedure to be followed for Appointed Representatives of Brooklands in case a complaint is lodged against you.

It also contains a standard complaints procedure to be adopted by our ARs, which is amendable provided a draft is approved by Brooklands beforehand.

Raising a complaint

Anyone who receives a service from an appointed representative may lodge a complaint against the firm. This may be done orally or in writing, and it may be raised with the appointed representative or Brooklands directly.

Informing of a complaint

If the appointed representative receives a complaint, it should notify Brooklands immediately of the date and nature of the complaint. Thereafter, an acknowledgement email should be issued informing the complainant that they can expect to receive a final response within 8 weeks' time from the date the complaint was raised. Brooklands will review this acknowledgement before it is issued.

If Brooklands receives a complaint in respect to services provided by one of its appointed representatives, it will aim to issue an acknowledgement email, informing the complainant that we will endeavour to provide them with our final response within 8 weeks from the date of their complaint. Thereafter it will get in touch with the appointed representative and inform them of the complaint.

Investigating the complaint

Brooklands, the appointed representative and its employees are expected to cooperate and conduct their affairs in relation to the complaint transparently. Brooklands may from time-to-time request documentation or other available evidence in order to allow it to reach a view of what amounts to a fair and reasonable resolution or for its records.

The appointed representative may also make use of Brooklands expertise to discuss what a fair and reasonable resolution might be. As the appointed representative is ultimately responsible for any compensation awarded to the consumer, it will have to decide how the complaint should be resolved and whether any compensation is awarded.

Issuing the final response letter

After the appointed representative has come to a decision on how it wishes to dispose of the complaint, it will be required to put the decision into writing. This must then be sent to Brooklands who will approve it, ensuring all the regulatory requirements for such letters is met, before it may be sent out to the consumer.

If the complaint is escalated

If the complaint is escalated, the appointed representative can choose whether to represent itself, request Brooklands to do this, or instruct external Counsel to provide representation.

The appointed representative will be expected to provide regular updates on any developments in the proceedings.

On your website

As part of our regulatory framework, **SCHEDULE 1** lays out the standard complaints procedure that we ask our ARs to employ. **This needs to be made available on your website.**

Should you wish to make amendments to the, please discuss this with Brooklands' Compliance Team and seek approval prior to making any amendments.

Any amendments agreed are subject to Brooklands sole discretion and may be revoked at any time. We may also from time to time require you to update this policy on your website.

SCHEDULE 1

We strive to provide the highest possible standard of service. However, we acknowledge there may be instances where you feel we have fallen short of this. If this happens, we encourage you to raise a complaint.

This Complaints Procedure outlines who can raise a complaint, the process for raising a complaint, the procedure in place to answer your complaint, and the next steps you may take if you remain unsatisfied with our answer.

Who can complain

If we provided a service to you then you may raise a complaint with us or with our regulatory Principal firm, Brooklands Fund Management Limited (“**Brooklands**”).

Raising a complaint

To ensure your complaint reaches the correct team internally, we encourage you to raise your complaint by emailing Brooklands’ General Counsel and include ‘Complaint’ in your email’s subject line. The contact information for Brooklands’ General Counsel is:

General Counsel:	Mike Williams
Email:	mwilliams@brooklandsfund.com
Telephone:	+44 (0) 20 7291 8166

Answering your complaint

Upon receipt of your complaint, we or Brooklands (depending on who you have contacted) will acknowledge your complaint as soon as reasonably practicable. We will investigate your complaint to provide a fair and reasonable answer. We may request further information from you when this is required to properly assess your case.

We aim to provide you with a final written answer to your complaint within 8 weeks after we received your complaint. If we are unable to answer you within 8 weeks’ time, we will contact you to let you know and explain the reasons for this.

If you are not satisfied

If you are not satisfied with our final response, or 8 weeks have passed since you made your complaint, then you may escalate your complaint to the Financial Ombudsman Service. Their contact details are:

Financial Ombudsman Service

Exchange Tower
Harbour Exchange Square
London E14 9SR
0800 023 4567
<https://www.financial-ombudsman.org.uk/>

