

Complaints Handling Procedure

This document sets out the Complaints handling procedure for the Broadstone group of companies.

Complaints can be raised by anybody, but it is anticipated that, in most circumstances, the party raising the complaint will be a Broadstone Client, or will be acting on their behalf.

If you are a member of a pension scheme where Broadstone provide services to the trustees, it is usually appropriate for formal complaints to be dealt with under the scheme's Internal Dispute Resolution Procedure (IDRP). If you complain to us under these circumstances, and we are not able to resolve this informally, your scheme's IDRP will apply.

Making a Complaint

Complaints may be made in person, by telephone, e-mail, fax or letter. Whilst every effort will be made to take the details of a verbal complaint, it may help us if you provide details in writing, particularly if the complaint involves a potential financial loss, or refers to significant distress or inconvenience.

Our service level

In all our contact with our Clients we aim to be polite and professional. For security and training purposes, we may monitor or record phone calls.

If your complaint is in relation to a service received from a third party, for example a provider of a product that we have recommended to you, we will forward your complaint to that third party and we will confirm to you that this has been done and tell you their contact details.

Complaints may involve complex financial and legal issues but we always try to set out our views clearly, in plain English and without using jargon. We will always take account of what you tell us about the case.

Dealing with a Complaint

Who will investigate my complaint?

The Head of Compliance & Legal will allocate your complaint to an appropriate staff member to deal with, or in some circumstances will deal with the matter personally. The complaint handler will be someone who has appropriate authority and competence to deal with your complaint, and if it is deemed necessary, is suitably independent and/or has not been directly involved in the matters complained about. The complaints handler will issue a response and/or final decision letter on the basis of their findings.

How will we reach our decision?

Our general approach is to look at complaints on a fair and reasonable basis. This means that we will take into account any relevant law, code of practice, regulatory rule, Financial Conduct Authority (FCA), The Financial Ombudsman Service (FOS), The Pensions Ombudsman (TPO) or Institute and Faculty of Actuaries (IFoA) guidance and industry best practice when coming to our decision. Where there is a dispute of fact we will decide what is most likely to have happened on the balance of probability, taking into account all the available evidence.

At the outset of the investigation we will ensure you are provided with contact details of the person at the firm you can contact directly if you have any questions regarding the complaints handling process or the progress of the investigation into your complaint.



If, having investigated all the issues, we conclude that your complaint should be upheld we will seek to offer you redress which is appropriate to the complaint and your circumstances. Often this will involve putting you in the position you would have been in if the issue had not arisen but occasionally a non-monetary form of redress may be more appropriate.

What happens if I don't agree with your decision?

Once you have received our final decision letter, if you are unhappy with our decision, then you may be able to refer the complaint to an appropriate independent third party. Further information, along with their contact details are shown below.

Normally, if we don't hear from you within eight weeks of our final decision letter, we will assume you are satisfied with our response and we will therefore close the complaint file.

Referral to an appropriate Independent Third Party

We will endeavour to resolve your complaint within eight weeks of when it was first received.

If your complaint remains unresolved after eight weeks, or you are unhappy with our final decision letter, you may have the right to take it directly to an appropriate supervisory authority for independent review. Depending on the nature of the service provided by us, this may either be FOS, TPO or the IFoA.

Not all of our Clients will be eligible to complain to an Ombudsman Service or the IFoA. Where we think that you may not be eligible we will bring this to your attention but, ultimately, it is for the relevant third party to determine who is, and who is not, eligible for its service. If there is any doubt about your eligibility we recommend that you seek clarification directly from the relevant third party.

Contact Details

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| Broadstone Head of Compliance & Legal 100 Wood Street London EC2V 7AN 020 3869 6900 / compliance@broadstone.co.uk www.broadstone.co.uk | The Financial Ombudsman Service Exchange Tower Harbour Exchange Square London E14 9SR 0800 023 4567 / complaint.info@financial-ombudsman.org.uk www.financial-ombudsman.org.uk |
| The Pensions Ombudsman 10 South Colonnade London E14 4PU 0800 917 4487 / enquiries@pensions-ombudsman.org.uk www.pensions-ombudsman.org.uk | The Institute & Faculty of Actuaries Level 2 Exchange Crescent 7 Conference Square Edinburgh EH3 8RA 0131 255 0826 / dpb@actuaries.org.uk www.actuaries.org.uk |

Your Feedback

We are regularly reviewing our procedures to ensure that we provide an efficient and fair service to our Clients. Your feedback is very helpful in enabling us to identify areas where we are getting it right and other areas that need more work. If you have any comments about the way we have handled your complaint, the standard and clarity of our correspondence or any other aspects of your experience of our service we would like to hear from you.