



THE INTERNATIONAL FAMILY OFFICE

Strictly Private & Confidential

COMPLAINTS HANDLING PROCEDURE FOR FCA REGULATED ENTITIES

JANUARY 2019

UK RISK & COMPLIANCE

COMPLAINT HANDLING

BACKGROUND

Within the Stonehage Fleming Group, there are five regulated entities that are authorised and regulated in the UK by the Financial Conduct Authority (“FCA”). These entities are Stonehage Fleming Investment Management Limited, Stonehage Fleming Advisory Limited, Stonehage Fleming Private Equity Limited, Stonehage Fleming Wealth Planning Limited and Stonehage Fleming Financial Services Limited (hereby collectively referred to as “Stonehage Fleming UK”). In accordance with FCA rules, Stonehage Fleming UK is required to:

- have procedures on the handling of complaints
- inform a complainant of the availability of those procedures
- provide a copy or a summary of those procedures either upon request or in the event that a complainant should express any dissatisfaction with services provided by Stonehage Fleming UK

SUMMARY OF PROCEDURES

The following points summarise Stonehage Fleming UK’s complaint handling procedures and will be followed by any Stonehage Fleming UK employee when in receipt of a complaint. Please note all complaints received will be subject to an independent review.

- **Upon receipt of a complaint or potential complaint, the employee will advise the relevant UK business head and UK Risk & Compliance (“UK R&C”)**
- **Stonehage Fleming UK will acknowledge, in writing, such communication promptly (and in any event no later than three business days).** We will ensure that complainants are kept informed as to the progress of the resolution of their complaint. The decision on who should acknowledge the complaint will be agreed between the relevant business head and UK R&C.
- For a complaint that is **resolved within three business days** after the day on which the complaint is received, Stonehage Fleming UK will send a summary of the action taken and resolution to the complainant. This will advise the complainant that they may be able to refer their complaint to the Financial Ombudsman Service (“FOS”) within **six months** of Stonehage Fleming UK’s summary resolution and make reference to the FOS website where further information can be sought.
- For a complaint **not resolved within three business days** after the day on which it is received, Stonehage Fleming UK will provide, a holding response (if applicable) and a final response within an **eight week period** from the date the complaint was received.
- Any holding response sent during the eight week period (ordinarily this will be sent within four weeks of the complaint being received) will explain why the reason for the delay and when the complainant can expect to receive a final reply, which will be **no later than eight weeks** from the date Stonehage Fleming UK received the complaint.
- The final response will inform the complainant that they may be able to refer their complaint to the FOS, if still dissatisfied, and that they must do so within **six months** of Stonehage Fleming UK’s final response. A FOS leaflet will be enclosed, and the response will also make reference to the FOS website address (www.financial-ombudsman.org.uk) noting that the complainant can seek further information from there.

