

# **Complaints Handling Policy**

In the course of your dealings with Momentum Global Investment Management Limited ("MGIM"), we realise that circumstances may arise where you may wish to register a complaint concerning our provision of, or failure to provide, a financial service.

This document highlights the steps you should take when making a complaint and outlines our procedures to deal with and resolve the complaint as quickly and effectively as possible. Our procedures have been developed to comply with the rules of our regulator, the Financial Conduct Authority ("FCA"), concerning dispute resolution.

- You should inform us of the nature of your complaint as soon as possible, preferably in writing in order to expedite resolution, although verbal complaints will also be recognised.
- Your complaint should be addressed to the Head of Compliance at our registered address. In order to assist us to process your complaint as quickly as possible, your communication should refer in as much detail as necessary to the events surrounding the complaint. We would also ask you to respond to our letters or other communications promptly, as this will assist us to resolve the issue in a timely manner.
- We will appoint a senior member of staff, who has not been directly involved with the issue of which you are complaining, to investigate your complaint.
- We will promptly acknowledge the receipt of your complaint in writing and provide you with the name and contact details of the person dealing with it.
- If we are unable to resolve your complaint, we will update you of the status in writing and indicate when we think we will be able to issue a final response. If your complaint is eligible, we will also inform you that you may refer your complaint to the Financial Ombudsman Service ("FOS")<sup>1</sup> if you are dissatisfied with either the delay or the content of any final response. We will enclose a copy of the FOS leaflet.
- If you are an 'eligible complainant' (See below), you will have the right to refer your complaint to the FOS, however you must have referred your complaint to us first and given us the opportunity to resolve the matter.
- Where MGIM deems redress to be appropriate, we will aim to provide fair compensation for any acts or omissions for which we are responsible and where you have suffered loss and we will promptly meet any offer of redress that you have accepted in writing.
- If at any time you are unhappy with MGIM's handling of your complaint, you should contact MGIM's Head of Compliance at our registered address.

### **Who can complain to the FOS?**

An 'eligible complainant' – that is to say: An eligible complainant must be a person that is:

1. a consumer (primarily considered to be an individual acting for purposes outside his trade, business or profession when dealing with MGIM) ;
2. an enterprise which has fewer than 10 employees, and has a group annual turnover or balance sheet of less than €2 million at the time the complainant refers the complaint to the respondent;
3. a charity which has an annual income of less than £1 million at the time the complainant refers the complaint to the respondent; or
4. 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 respondent.

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<sup>1</sup>Note: a Professional Client is not generally an eligible complainant. The Financial Ombudsman Service is available to Individuals and small entities under the rules of the FCA Sourcebook, DISP 2.73R. However, if the complaint is in relation to MiFID Investment business you may also be eligible to be considered by the FOS.