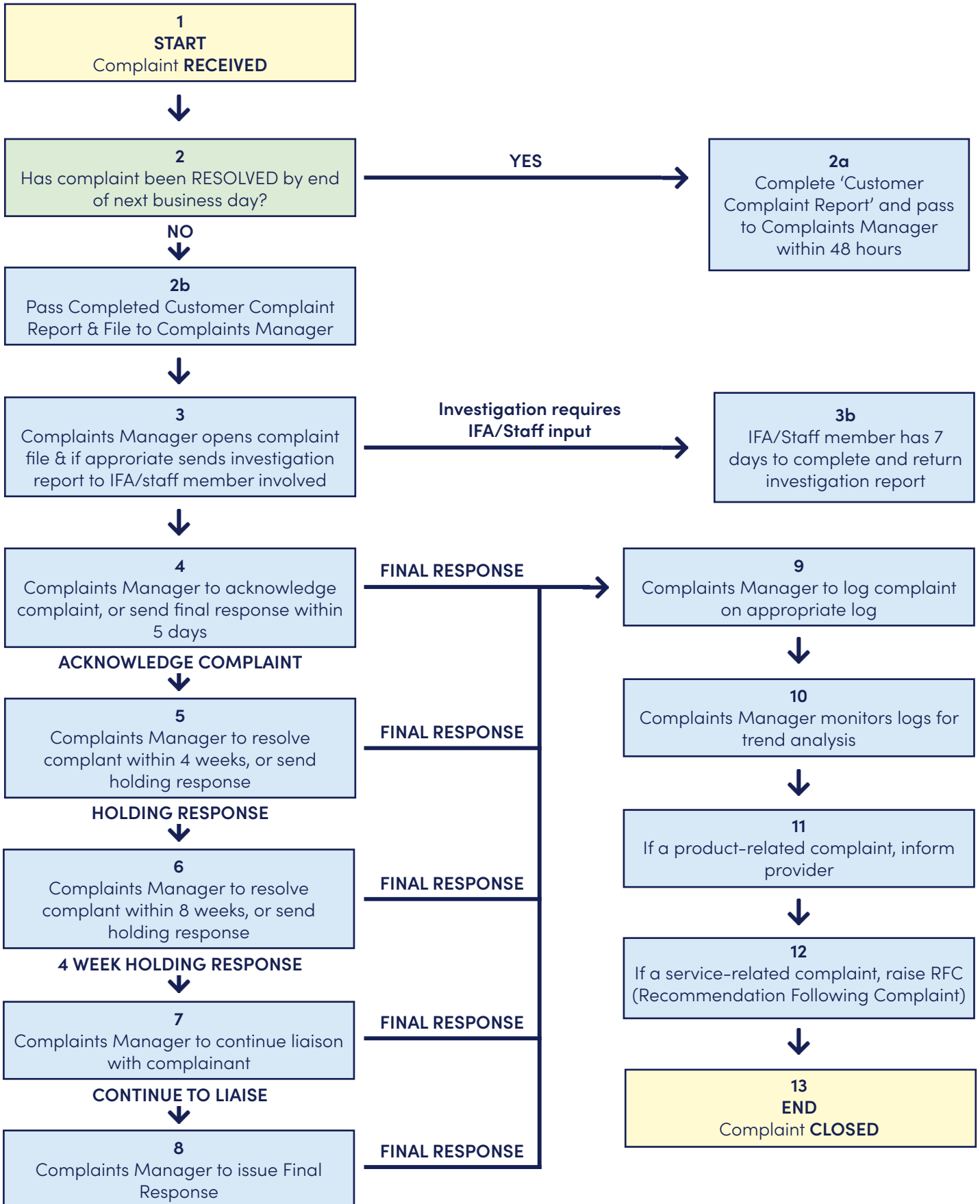


Holborn Assets Complaints Procedure



www.holbornassets.com

The Holborn Assets Complaints Procedure



Complaints Procedure Key Steps

Step 1: Start - Complaint Received

Complaint is received by the firm via telephone/e-mail/writing etc.

Go to step 2

Step 2: Has the complaint been resolved by end of next business day?

Following initial contact with the complainant, has the complaint been successfully resolved within one business day?

Yes - go to step 2a

No - go to step 2b

Step 2a: Pass completed Customer Complaint Report (CCR) to the Complaints Manager so they can enter complaint on the 'Complaint resolved by end of next business day' log and raise RFC (recommendation following complaint), if appropriate

If, from the initial contact with the complainant, the complaint has been resolved within one business day, ensure all fields on the 'Customer Complaint Report' have been completed and handed within 48 hours to the Complaints Manager. Complaints Manager will fully complete 'Complaint resolved within one business day' log.

Go to step 9

Step 2b: Pass completed Customer Complaint Report (CCR) and file to the Complaints Manager within 24 hours

If, from the initial contact with the complainant, the complaint has not been resolved within one business day, pass the completed Customer Complaint Report and file to the Complaints Manager.

Go to step 3

Step 3: Complaints Manager opens complaint file and if appropriate sends investigation report to IFA/Staff member involved

Complaints Manager assigns complaint number and opens file. Where appropriate emails the complaint investigation template form to the IFA/Staff member and advises the date that it is required to be returned.

Step 3b: IFA/Staff member has 7 days to complete and return the investigation report

IFA/Staff member has 7 days from receipt of the investigation form to complete and send back to Complaints Manager.

Step 4: Complaints Manager to acknowledge the complaint or send final response

Complaints Manager will send the complainant a written acknowledgement of their complaint within 5 business days of its receipt. Either the Written or Verbal acknowledgement letter must be used and have a copy of the Holborn Complaint Procedure enclosed.

Go to step 5

If the Complaints Manager is able to provide a final response within 5 business days of receipt of the complaint, they may combine the acknowledgement of the complaint with the final response. A copy of the Holborn Complaint Procedure must be enclosed.

Step 5: Complaints Manager to resolve complaint within 4 weeks or to provide a holding response

Complaints Manager will resolve the majority of complaints within 4 weeks, providing the complainant with a final response.

Final Response sent - go to step 10

If however the complaint is complex and taking longer to resolve, a holding response will be sent to the complainant explaining the situation and informing the customer when further contact will be made (which must be within 8 weeks of the receipt of the complaint).

Holding Response sent - go to step 6

Step 6: Complaints Manager to resolve complaint within 8 weeks or to provide a Holding Response

Complaints Manager will endeavour to resolve the complaint within 8 weeks of receiving the complaint, providing the complainant with a final response.

Final Response sent - go to step 10

If however the Complaints Manager is unable to provide a final response, a holding letter will be issued explaining why the firm is not yet in a position to provide a final response, the reasons for the delay, and informing the customer when the firm expects to be able to provide a final response.

Holding Response sent - go to step 7

Step 7: Complainant to continue liaison with Complaints Manager

If the complaint has not been resolved within 8 weeks, the complainant may continue to liaise with Complaints Manager.

Continue to liaise with the Complaint Manager - go to step 8

Step 8: Complaints Manager to issue final response

Following investigation, Complaints Manager will issue their final response.

Go to step 9

Step 9: Complaints Manager to log complaint

Complaints Manager will log all complaint details on Complaints log, ensuring all fields are completed.

Go to step 10

Step 10: Complaints Manager to monitor logs for trend analysis

Monitor logs in order to identify any systemic issues/trends arising for complaints received.

Go to step 11

Step 11: If a product-related complaint, inform provider

If complaint is product-related, inform provider of complaint; perhaps recommend changes.

Go to step 12

Step 12: If a service-related complaint, raise RFC (Recommendation Following Complaint)

For service failures, Complaints Manager raises a RFC to prevent this type of case reoccurring.

Go to step 13

Step 13: End

End - complaint has been closed.



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