

COMPLAINTS PROCEDURE UK CLIENTS

SEVEN VII
Investment Management

COMPLIANCE // JUNE 2018

At Seven Investment Management (7IM), we pride ourselves on excellent customer service. Our aim is to have a minimal number of complaints and a maximum number of satisfied clients. However, we do recognise that there could be times when our clients feel that we fall short of this aim. We view complaints as an opportunity for learning what we as an organisation can do to help our clients, setting their expectations and delivering to those expectations without error and in a friendly way. The rest of this document explains our process for handling complaints.

MAKING A COMPLAINT

If you have a financial adviser, they will be able to raise a complaint on your behalf, alternatively you can contact us directly by phone: 0207 760 8777 or email: compliance@7im.co.uk. You can also write to the Compliance Officer, Seven Investment Management LLP, 55 Bishopsgate, London EC2N 3AS. If you have purchased a 7IM fund using the application forms available on our website, you can contact our Fund Servicing Centre, which is managed on our behalf by Northern Trust. Their contact details are 0333 300 0354 or 7iminvestorservices@ntrs.com.

OUR COMPLAINTS PROCESS

If we can resolve your complaint within **3 business days** following receipt of your complaint, we will send you a Summary Resolution Communication. Where the matter takes longer than 3 business days to resolve, we will send you an acknowledgement letter and a copy of our complaints procedure. There may be some occasions when we will need to ask for more information before the complaint investigation can proceed.

A nominated complaint handler, who will be impartial and unbiased, will begin the investigation. This will involve gathering all documents and information necessary for a clear picture of the chain of events to become evident. We will aim to resolve all complaints as quickly as possible but if the complaint cannot be readily resolved we will contact you within 4 weeks to give an update on our progress and an estimated time to resolution.

We will provide you with a final decision on our findings **within 8 weeks** of receipt or, failing that, an explanation as to why we have not been able to do so and an indication of when you can expect a final response.

In our final response we will provide you with details of the Financial Ombudsman Service (see below) and either:

- Accept the complaint and where appropriate offer redress or remedial action;
- Offer redress or remedial action without accepting the complaint; and/or
- Reject the complaint and explain the reasons for this.

The Ombudsman will not generally review complaints which relate solely to investment performance, however, we are happy to explain the logic behind the choices that were made and the reasons for the subsequent performance.

Where we become reasonably satisfied that a third party may be solely or jointly responsible for the matter under investigation, we may forward the complaint, or the relevant part of it, to that third party. Where we decide that this is the most appropriate course of action, we will act promptly and will inform you of our actions accordingly.

FINANCIAL OMBUDSMAN SERVICE

If you are unhappy with the outcome of 7IM's investigation, you can ask the Financial Ombudsman Service to review the matter. The Financial Ombudsman Service, is there to help settle disputes between consumers and businesses providing financial services. Their contact details are:

Financial Ombudsman Service, Exchange Tower,
London E14 9SR

Phone: 0300 123 9123

Email: complaint.info@financial-ombudsman.org.uk

More information is also available on their website:
www.financial-ombudsman.org.uk

THE PENSION OMBUDSMAN

Any pension related complaints that we can't settle can be referred to The Pensions Ombudsman. Their contact details are:

The Pensions Ombudsman, 10 South Colonnade,
Canary Wharf, E14 4PU

Phone: 0800 917 4487

Email: enquiries@pensions-ombudsman.org.uk

More information is available on their website: www.pensions-ombudsman.org.uk

ONLINE DISPUTE RESOLUTION

The European Commission has established an Online Dispute Resolution (ODR) platform to enable a customer who is a European Union (EU) resident who purchased a product or service online to submit a complaint through a central European website. The purpose of the site is to ensure those complaints are passed to the appropriate independent dispute resolution service. The link to the ODR platform can be accessed here: <http://ec.europa.eu/odr>. If you are unhappy with the outcome of our investigation, the appropriate resolution service is the Financial Ombudsman Service as set out above. Alternatively EU residents can use the ODR platform. If you decide to use the ODR platform, you will need the following information:

Our name: Seven Investment Management LLP

Our website address: www.7im.co.uk

Our address: 55 Bishopsgate, London EC2N 3AS

Our email: information@7im.co.uk

Our geographic address: United Kingdom

TREATING CUSTOMERS FAIRLY

7IM wishes to be seen by our clients as to have understood their points and responded to them appropriately, without being defensive. All correspondence will be clear and written in plain English. We will include copies of relevant documentation with 7IM's response if we think this may help (e.g. text from a brochure or the website).

MANAGEMENT INFORMATION

The person with responsibility for handling complaints at 7IM is the Chief Compliance Officer. On a monthly basis, the Compliance team will provide a summary to the Management Committee detailing all relevant complaints received during the month. 7IM also periodically conduct root cause analysis in order to identify common causes of complaints.

TAKING CIVIL ACTION

If your complaint is not resolved to your satisfaction, you may be able to take civil action. However, we hope that you would discuss your concerns with us in the first instance.

For more information call 0207 760 8777 or visit www.7im.co.uk

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