

Complaints policy and complaints handling procedures

WALKERCRIPS

This is the Complaints Policy and Complaints Handling Procedures for the Walker Crips Group plc (“Walker Crips”), which in this context comprises:

- Walker Crips Investment Management Limited (“WCIM”);
- Barker Poland Asset Management LLP (“BPAM”);
- Walker Crips Financial Planning Limited (“WCFP”);
and
- Ebor Trustees Limited (“EBOR”).

WCIM, BPAM, WCFP and EBOR are authorised and regulated by the Financial Conduct Authority (“FCA”) and are subject to the jurisdiction of the Financial Ombudsman Service (“FOS”). The purpose of this policy is to explain to our customers or potential customers our policy and procedures when dealing with complaints.

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1. Our approach to complaints

Walker Crips is committed to ensuring all complaints received are handled fairly, consistently and promptly and will identify and remedy any recurring or systemic problems, as well as any specific problem identified by the complainant. The firm suggests that customers initially discuss the problem with their Account Executive.

2. Definition of a complaint

Any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the provision of, or failure to provide, a financial service or a redress determination which:

- a. Alleges that the complainant has suffered (or may suffer) financial loss, material distress, or material inconvenience; and
- b. Relates to an activity of that respondent, or any other respondent with whom that respondent has some connection in marketing or providing financial services or products, which comes under the jurisdiction of The Financial Ombudsman Service (“FOS”).

3. Eligible complainant

FOS will consider a complaint brought by, or on behalf of, an eligible complainant. An eligible complainant must be a person that is either:

1. A consumer i.e. an individual customer, or joint customers; or
2. a “Micro-enterprise”. Micro-enterprises can bring complaints to the Ombudsman as long as they have an annual turnover of less than €2M and fewer than ten employees; or
3. a charity which has an annual income of less than £6.5M at the time the complainant refers the complaint to us; or
4. a Trustee of a Trust which has a net asset value of less than £5M at the time the complainant refers the complaint to us; or
5. a Consumer Buy To Let (CBTL) consumer in relation to CBTL business; or
6. a small or medium sized enterprise (SME) which has an annual turnover of less than £6.5M and (i) fewer than 50 employees or (ii) an annual balance sheet that does not exceed £5M; or
7. a Guarantor, who is not a consumer and has given a guarantee or security in respect of an obligation or liability of a person which was a micro-enterprise or SME as at the date that the guarantee or security was given.

An eligible complainant is one who is or has been Walker Crips’ customer or potential customer. An eligible complainant has the right to refer a complaint directly to the FOS but only after Walker Crips has had an opportunity to try and resolve it and/or eight weeks have elapsed since the date of the complaint.

Where an individual who complains is not an Eligible Complainant, then this becomes a Customer Service matter and should be directed to the Customer Services Team.

4. How to raise a complaint

If a customer has a complaint that they wish to raise, e.g. because the service they have received has not met the standard of care that they should expect, they should contact the Compliance Department in writing or via email, providing all the relevant details. Customers may also raise a complaint in person or by telephone to their Account Executive with a copy to the Compliance Department, if they so wish, or, if they prefer not to deal with the Account Executive, they should write exclusively to the Compliance Department who will notify the complainant of the process and their right to raise the matter with the FOS. The Compliance Department will liaise with the appropriate personnel to assess and, if appropriate, resolve the issue.

Complaints raised regarding **Walker Crips Investment Management** should be sent to:

Compliance Department

Email: compliance@wcgplc.co.uk

Telephone switchboard: 020 3100 8000

In writing:

Nathalie Ntumazah, Compliance Manager, Compliance Department,
Walker Crips Investment Management Limited, Old Change House, 128 Queen Victoria Street, London EC4V 4BJ

Complaints raised regarding **Barker Poland Asset Management** should be sent to:

Nathalie Ntumazah, Compliance Manager

Email: nathalie.ntumazah@barkerpoland.co.uk

Telephone switchboard: 020 3100 8622

In writing:

Nathalie Ntumazah, Compliance Manager,
Barker Poland Asset Management LLP, Old Change House, 128 Queen Victoria Street, London EC4V 4BJ

Complaints raised regarding **Walker Crips Financial Planning**
or **EBOR Trustees** should be sent to:

Lisa Starkey, Compliance Manager

Email: lisa.starkey@wcgplc.co.uk

Telephone number: 01904 544327

In writing:

Lisa Starkey, Compliance Manager, Walker Crips Financial Planning Limited or
Ebor Trustees Limited, Apollo House, Eboracum Way, York YO31 7RE

If a customer authorises a third party to complain on his/her behalf, the customer must provide written authorisation to the company, allowing the company to communicate with the third party.

5. Procedure

All complaints received must be referred immediately to the Compliance Department who will carry out a prompt and thorough investigation.

6. Timescale for dealing with a complaint

If a complaint has been resolved by the close of business on the third business day after it was received, then the firm will write to the complainant confirming receipt of the complaint, that it is considered to have been resolved; and what the complainant can do if he/she is still dissatisfied.

If a complaint has not been resolved by close of business on the third business day after the firm received the complaint, a written acknowledgement and a copy of these complaint procedures will be sent to the complainant by the Compliance department, within five business days of the complaint being received.

The firm will ensure that the complainant is kept informed of progress and the measures taken to resolve the complaint and that the firm will endeavour to resolve the complaint as early as possible. The firm will send to the complainant the following, by the end of eight weeks after the complaint was received:

1. A final written response:

- a. That includes a link to the FOS website, unless the complainant has already been provided with a copy of the FOS explanatory leaflet;
- b. That states “You have the right to refer your complaint to the FOS free of charge, but you must do so within six months of the date of this letter. If you do not refer your complaint in time the FOS will not have Our permission to consider your complaint and so will only be able to do so in very limited circumstances, e.g. if FOS believes that the delay was as a result of exceptional circumstances.”; and
- c. Which includes contact details for the FOS at “Exchange Tower, London, E14 9SR”, including its telephone number, 0800 023 4567, switchboard, 020 7964 1000, email, complaint.info@financial-ombudsman.org.uk; and website, www.financialombudsman.org.uk

Or:

2. a written response which:

- a. Explains why the firm is not in a position to provide a final response and informs the complainant when they should expect to receive one; and
- b. Informs the complainant that they may now refer the complaint to the FOS (for contact detail see above).

A complainant has the right to pursue a complaint through a civil action either as an alternative to the FOS or, if dissatisfied with a judgement by the FOS, about a complaint which has been referred to the FOS. However, it should be noted that this course of action is likely to incur costs.

The firm will cooperate fully with FOS in the handling of any complaints. The firm will deal with all complaints without charge and if the firm is required to offer any redress, it will be made promptly.

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