

## **Complaints Procedure**

**for**

**Stenham Management Services (C.I) Ltd.**

**Stenham Asset Management Inc.**

**Stenham Asset Management America Inc.**

**Stenham Asset Management (UK) Plc.**

**Stenham Advisors Plc.**

## Introduction

These procedures have been adopted as best practice and reflect rules and guidance from various jurisdictions regarding how complaints should be handled.

### 1. Complaints Procedure

All complaints received by any Employee of Stenham, whether orally or in writing (no matter how small), must be referred via email to Compliance and other relevant persons at the following address: -

[complaints@stenham.com](mailto:complaints@stenham.com)

Compliance will acknowledge receipt of the complaint within 48 hours of the complaint being received (see the attached **Acknowledgement Letter**). Stenham will aim to send a full response in writing within 10 working days.

If there is any doubt as to whether a communication from a Client is a complaint, Compliance should be consulted.

All correspondence/communication in connection with a complaint should be filed on the Client's file.

Errors made by Stenham Employees should be similarly treated as a complaint, with compensation issues looked at objectively by the relevant Manager/Compliance Officer.

All issues requiring compensation must be referred and cleared by a Director and documented.

### 2. Significant and Unsettled Complaints

#### Significant Complaint

A significant complaint is one concerning breach of the law, malpractice or impropriety, repetition/recurrence of a matter previously complained of.

#### Unsettled Complaint

If a significant complaint remains unsettled for longer than three months, the relevant Regulator is to be immediately informed. The Client has to be informed of his/her right to take up the matter directly with the Regulator.

### 3. Record Keeping

Compliance in Guernsey maintain a Register of Complaints and Errors.

Only complaints deemed substantive rather than general administrative grumbles will be recorded in this report.

The Compliance Officer will list any complaints received in the quarterly compliance reports to the boards.



## Acknowledgement letter

Address of Complainant

Dear [Enter name],

Thank you for your [letter/email] received in our office on [date].

I am sorry to learn that you have been dissatisfied with the service we have provided and can confirm that we will be conducting a thorough investigation into your concerns lead by \_\_\_\_\_.

Please find enclosed a copy of our internal Complaints Procedure for your information. Please take time to read this as it explains how we will deal with your complaint and when we will contact you again.

In the meantime, if you have any queries, please do not hesitate to contact me.

Yours sincerely,

Compliance Officer

## Internal Complaints Procedure

### **To whom to address a complaint**

Complaints against Stenham can be submitted in writing or via email. Complaints must be submitted to one of the following addresses: -

#### **In writing**

The Compliance Officer  
Stenham  
Kingsway House  
St. Peter Port  
Guernsey  
Channel Islands  
GY1 2QE.

The Compliance Officer  
Stenham  
180 Great Portland Street  
London  
W1W 5QZ.

#### **Via email**

[complaints@stenham.com](mailto:complaints@stenham.com)

### **Handling the complaint**

Upon receipt of a complaint, the matter will be considered by the Compliance Officer and another suitably qualified senior person not involved in the subject matter of the complaint. This person will have the seniority to investigate the complaint effectively and will have the authority to resolve the matter. All relevant documentation, including facts of the matter and Client records, will be made available to the person investigating the complaint.

Stenham will aim to send you a full response in writing within 10 working days. If exceptional circumstances mean we cannot do this, we will let you know what is happening – and when you can expect a full response from us.

If we find your complaint about our service is justified, we will tell you how we will sort out the problem. Where relevant, we will also tell you how we plan to make sure the mistake does not happen again.

**Record of Complaints Form**

<b>Date Complaint Received</b>	<b>Name of Client</b>	<b>Nature of Complaint</b>	<b>Date Resolved</b>	<b>Nature of Resolution of Complaint</b>	<b>Compliance Officer Review</b>