



Brompton Asset Management Ltd Complaints Handling Procedure

Brompton Asset Management Ltd (Brompton) is authorised and regulated by the Financial Conduct Authority (FCA)ⁱ with the Firm Reference Number 942254.

FCA rules dictate how Brompton handles complaints from clients and potential clients. The material below covers how to make a complaint, how Brompton handles complaints and the steps complainants may take if dissatisfied with Brompton's response.

Please note Brompton may not be the most appropriate recipient of complaints in all circumstances. Direct investors in Brompton-managed funds should address complaints initially to the fund's authorised corporate director in the case of an open-ended investment company (OEIC) or authorised unit trust manager in the case of a unit trust.

- For the EF Brompton Multi Manager and WAY Portfolio funds this will be Way Fund Managersⁱⁱ.
- For the MI Brompton UK Recovery Unit trust this will be Fundrockⁱⁱⁱ.
- For the VT Brompton funds this will be Valu-Trac Investment Management^{iv} or the Grosvenor Consultancy^v.

Similarly, investors in model portfolio services managed by Brompton should direct complaints to their independent financial advisers (IFAs). Investors wishing to complain about New Star Investment Trust should direct complaints to Apex^{vi}, which is the company secretary and administrator.

The FCA permits firms to refer a complaint between one another if they believe another firm should be involved in that complaint or if they believe another firm should be the sole respondent to that complaint. Other firms may, therefore, refer complaints to Brompton where appropriate and, similarly, Brompton may refer complaints it receives to other firms if they are better placed to respond.

How to complain

Clients or potential clients dissatisfied with Brompton's service or lack of service should, initially, try to resolve the matter with their main contacts at Brompton. Alternatively, they should send an email to Brompton's general email address, info@bromptonam.com, or phone Brompton's switchboard number, 020 7045 0600.

If complainants are dissatisfied with the response from their main Brompton contacts or Brompton has not provided them with a response by the close of the third business day following receipt of a complaint, all details relating to that complaint will be passed to Brompton's compliance department, whose email address is compliance@bromptonam.com. The compliance department is then charged with investigating such complaints competently, diligently and impartially.

How Brompton will handle complaints

Brompton will promptly send a written acknowledgement of a complaint, usually via an email, and may request additional information. The complainant will then be kept informed of the progress of the investigation into the complaint. Please note that, depending on the nature of the complaint, Brompton may suspend trading in the portfolio or portfolios involved while the complaint is investigated. Clients will be notified if this is required.

Within eight weeks of receiving a complaint, Brompton will send either a final response to the complaint or a written response explaining the reasons for any delay in providing a final response and indicating the expected date of providing a final response.

Brompton's final response will summarise the relevant facts, findings and conclusions and state whether the complaint has been upheld. Where appropriate, Brompton will offer redress or remedial action and enclose details of how a complainant can contact the Financial Ombudsman Service (FOS)^{vii}.

Steps a complainant may take if dissatisfied with Brompton's response

Complainants dissatisfied with Brompton's final response, or if Brompton fails to resolve the relevant complaint within eight weeks of the firm's receipt of the complaint, may have the right to refer complaints to the FOS. This must, however, be done within six months of the date of Brompton's final response. If complainants do not refer complaints within this time limit, the FOS will not have Brompton's permission to consider such complaints and thus will only be able to do so in limited circumstances. Complainants may also have the right to take civil action.



Contact details

ⁱ The FCA's contact details are:

Address: The Financial Conduct Authority
12 Endeavour Square
London
E20 1JN
Phone: 0800 111 6789 (Freephone)
Website: www.fca.org.uk

Please note, the FCA does not investigate individual complaints but has a webpage describing the options available to complainants: <https://www.fca.org.uk/consumers/how-complain>

ⁱⁱ WAY Fund Managers Limited are the authorised corporate director/authorised unit trust manager of the following funds:

- The six sub-funds of the EF Brompton Multi Manager OEIC
- The WAY Flexible Global Growth Portfolio
- The WAY Global Balanced Portfolio
- The WAY Global Cautious Portfolio
- The WAY Global Growth Portfolio
- The WAY MA Cautious Portfolio

WAY's contact details are:

Address: WAY Fund Managers Limited
Cedar House
3 Cedar Park
Cobham Road
Wimborne
Dorset
BH21 7SB
Phone: 01202 855856
Website: www.wayfunds.com

ⁱⁱⁱ FundRock is the authorised corporate director of the MI Brompton UK Recovery Unit Trust.

Contact details are:

Address: The Compliance Officer
FundRock Partners Limited
Hamilton Centre, Rodney Way
Chelmsford
CM1 3BY

^{iv} Valu-Trac Investment Management Limited is the authorised corporate director of the VT Brompton funds.

Valu-Trac's contact details are:

Address: Valu-Trac Investment Management Limited
Orton
Moray
IV32 7QE
Phone: 01343 880344
Website: www.valu-trac.com

The Grosvenor Consultancy Limited is the IFA for investors in the VT Brompton funds.

Grosvenor's contact details are:

Address: The Compliance Officer
^v Grosvenor Consultancy Ltd
76 Macrae Road
Ham Green
Bristol
BS20 0DD
Phone: 01275 373348
Website: www.grosvenorconsultancy.co.uk



^{vi} Apex is the company secretary and administrator of the New Star Investment Trust plc.

Contact details are:

Mail: Apex Fund Services S.A

Attn: Mr John Grosso

3, rue Gabriel Lippmann

L-5365 Munsbach

Email: ApexOfficersLux@apexfs.com

^{vii} The FOS's contact details are:

Address: The Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Phone: 0800 023 4567 (Freephone)

Website: <http://www.financial-ombudsman.org.uk/>

The FOS also provides a webpage on how you are able to make a complaint:

<http://www.financial-ombudsman.org.uk/consumer/complaints.htm>

^{viii} Please note the FOS can only consider complaints from 'Eligible Complainants'. Generally, natural persons will be considered eligible complainants. Enterprises, trusts and charities may be considered eligible complainants depending on their size.