

INTERNAL PROCEDURES FOR THE HANDLING OF COMPLAINTS MARLBOROUGH INVESTMENT MANAGEMENT LTD

This document is designed to provide information on how we will act in the event that we receive a complaint. It describes the procedures that we will undertake, which are in accordance with the requirements of our Regulator, the Financial Conduct Authority (FCA). Our FCA number is 115231.

Making a complaint

All complaints should be referred in the first instance to the Compliance Officer:

You can write to: Nikesh Ganatra, Compliance Officer, Marlborough Investment Management Ltd,

PO Box 1852, Lichfield, Staffordshire, WS13 8XU.

Telephone: 01283 791600

Email: Nikesh.Ganatra@marlborough.co.uk

What we will do to resolve your complaint

In some cases, we will be able to resolve your complaint within three working days of receiving it, we will issue you a written summary of the resolution confirming that your complaint has been resolved.

If we are unable to resolve your complaint within three working days, a written acknowledgement will be issued promptly and no later than five working days after receiving your complaint. The written acknowledgement of the complaint will include a final response if the investigation is complete.

If we cannot reach a decision in time to include it in your acknowledgement letter, it will include a statement that a written report will follow once the investigation is complete.

In the case of an oral complaint, a statement of the firm's understanding of the complaint will be included in your acknowledgement letter.

Every effort will be made to resolve complaints within the first eight weeks. If the investigation is not complete within eight weeks, a further letter will be sent explaining that the firm is still not in a position to provide a final response. The letter will include an explanation of why the firm is not in a position to make a final response and an indication of when it expects to be able to provide one.

If the investigation is not complete within eight weeks of receipt, you may be able to refer the complaint to the Financial Ombudsman Service (FOS).

If you're not happy with our final decision

Once the investigation is complete a final response letter will be sent that will provide a summary of our investigation and our decision in the matter.

If at this stage you are dissatisfied with the outcome of our investigation, you may have the right to refer the matter to the Financial Ombudsman Service (FOS) but must do so within six months of the date of the final response. Details of this service can be found at http://www.financial-ombudsman.org.uk/.

You can write to: The Financial Ombudsman Service

Exchange Tower, London E14 9SR 0800 023 4567 or 0300 123 9123

Telephone: 0800 023 4567 or 0300 123 9123

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

In the case of a MiFID complaint, you may also be able to take civil action.