

COMPLAINTS PROCEDURES FOR INSTITUTIONAL CUSTOMERS

This procedure is written in accordance with the Financial Services Authority (“FSA”) Complaint Handling Rules

We will consider all complaints received from an Eligible Complainant, classified as an Intermediate Customer or Market Counterparty:

- (a) Who is or has been a customer of the firm;
- (b) The complaint arises out of matters relevant to being or having been a customer;
- Or
- (c) The complaint arises out of our actions or failure to act where the complainant is a potential customer of the firm.

NOTE: A complaint may be made on behalf of an eligible complainant by another party authorised by you.

In the event that we receive a complaint we will enter it on to our complaint register, which will record the details of your complaint, the FSA classification, and enable us to track your complaint through to resolution.

We will retrieve all the necessary documentation relevant to your account from our files and systems. These documents will be read and considered in conjunction with your complaint by our experienced Customer Services Executives.

We will endeavour to respond to and resolve your complaint straight away, which we consider to be at least one business day after the day we received your complaint. However, we may need to carry out further internal investigations, if these are required we will send you a notice of investigation letter within 5 working days from when we received your complaint.

The notice of investigation letter will include:

- an explanation of why a different person is responding if it is not the person you addressed your complaint to;
- the name and job title of the individual handling your complaint;
- a timescale for when we will correspond further, which will be no more than 4 weeks from the receipt of your complaint; and
- A copy of our complaint handling procedures.

In the unlikely event that our investigations require longer than 4 weeks to complete, we will write to you to explain why we are not yet in a position to respond to your complaint and indicate when we will make further contact (This must be within 8 weeks of the receipt of the complaint).

If after 8 weeks we are still not in a position to make a response, we will write to you and give reasons for the delay and an indication when we expect to provide a full and final response.

Once our investigations are complete we will write to you with our response, this will be either a final response, or an offer letter, depending on the circumstances of your complaint.

A Final Response is:

Where we believe we have fully addressed your complaint;

An Offer Letter is:

Where we consider that you are entitled to some redress, and believe that we have fully addressed your complaint. This will include a page for you to state your acceptance and return to us. We will then forward the agreed redress in a final response letter.

We will consider a complaint closed when;

- we have sent you a final response; or
- you have indicated in writing that you accept our offer or response; or
- you fail to respond to our correspondence within 8 weeks from the date of our written response.

NOTE:

Whilst you still have a right to complain, the Financial Ombudsman Service are unlikely to consider complaints from entities with net assets in excess of one million sterling.

This is FOS policy and is outside Newton's control. This will not affect the way our Complaints procedure is implemented.

You may also not have rights under the Financial Services Compensation Scheme (FSCS). Full details of the arrangements under FSCS are available from the Financial Services Compensation scheme, 7th Floor, Lloyds Chambers, Portsoken St, London E1 8BN. (Telephone: 020 7892 7300)

Contact details;

You can contact us:-

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MFC

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