

Complaints Handling Procedures

When a complaint is received/identified, River and Mercantile Asset Management LLP (“RAMAM”) must communicate with the complainant clearly, in plain language that is easy to understand and reply to the complaint without undue delay and in any case, before the end of the third business day following the business day on which the complaint was received (so the business day of receipt + 3 business days) (the “Response Date”).

Complaints Resolved prior to close of business on the Response Date ¹

Where RAMAM resolves a complaint it shall by close of business on the Response Date apply the following procedure.

- 1) Following investigation by the CMF, communicate, as the context requires, in a summary resolution communication or in a final response the firm’s position on the complaint to the complainant and inform them about any other options available to them, including the following:
 - a. Referring to the fact that the complainant has made a MIFID complaint and inform them that RAMAM considers this complaint resolved (including whether RAMAM accepts the complaint or not and whether any redress will be awarded to the complainant or not); and
 - b. The ability for the complainant to refer their complaint to an alternative dispute resolution entity or that the complainant may be able to take civil action if dissatisfied with the resolution of the complaint. In describing those options RAMAM must include the information relating to the Financial Ombudsman Service required pursuant to DISP 1.1A.31 and the client’s right to refer its complaint to the ombudsman.

Complaints Not Resolved by the close of business on the Response Date ² (but where RAMAM has acknowledged the complaint by the Response Date)

- 1) Following receipt of a complaint RAMAM must send the complainant a written acknowledgment by the Response Date providing early reassurance that it has received/identified the complaint and is dealing with it and ensure that the complainant is kept informed thereafter of the progress of the measures being taken for the complaint’s resolution.
- 2) Upon resolution of the complaint, RAMAM must communicate in a final response to the complainant, the firm’s position on the complaint (including acceptance or non-acceptance of the complaint and if any redress has been awarded) and the complainant’s options, including a referral of the complaint to an ADR entity or ability to take civil action if the complainant remains dissatisfied with RAMAM’s resolution of the complaint. In describing those options RAMAM must include the information relating to the Financial Ombudsman Service required pursuant to DISP 1.1A.31 and the client’s right to refer its complaint to the ombudsman.

RAMAM shall endeavour to resolve all complaints and deliver its final response within the period of 8 weeks from receipt or identification of the Complaint. Where this is not possible, RAMAM will issue a communication to the complainant explaining why a final response is yet to be issued and indicating when a final response can be expected.

¹ DISP1.1A.23R-DISP1.1A.27G

² DISP 1.1A.28R – DISP1.1A.34G