

SUMMARY OF COMPLAINTS HANDLING PROCEDURES

Kleinwort Hambros has a complaint handling procedure in place for the investigation of complaints received. We investigate all complaints made by our customers, or potential customers, regarding the products/services or advice we provide.

A complaint can be made in person, via the telephone or in writing either by letter or email. Once received, your complaint will be logged and investigated. Your complaint will normally be investigated by an individual with some knowledge and experience of your case. However, depending on the nature of your complaint, an Independent Investigator may be appointed. An Independent Investigator will be someone appointed from within Kleinwort Hambros with appropriate seniority, knowledge and experience, who has not been involved in the activity that has given rise to your complaint. We will aim to resolve your complaint as quickly as possible.

The following timetable summarises when you will receive a response and what it will include:

ON RECEIPT OF A COMPLAINT

Within five business days you will be sent an Acknowledgement Letter (“the Acknowledgement”) confirming the date of receipt of your complaint. If your complaint was made verbally, either by telephone or in a meeting with a member of staff, the Acknowledgement will summarise our understanding of the basis of your complaint. If this summary is not correct you must advise us as soon as possible. A copy of this complaints handling procedure will also be included with the Acknowledgement.

WITHIN TEN BUSINESS DAYS OF SENDING THE ACKNOWLEDGEMENT LETTER

We will send you either an initial response or a final response:

1. An Initial Response (or a Further Update)

If we are unable to provide a detailed response at this time, we will advise you of this and explain the reason for the delay. The letter will also indicate when you can expect a more detailed response or update on the investigation of the complaint. In the event that we are unable to provide you with a final response within the time line indicated in our initial response, then we shall provide you with an update at the earliest possible opportunity and will continue to provide updates from time to time, until we are in a position to provide you with a final response.

2. A Final Response

Once the investigation has been completed we will provide you with a full response. This letter will also include, if appropriate, any corrective action proposed by Kleinwort Hambros in response to the complaint. We will consider the complaint as being resolved if we do not receive any further correspondence from you within four weeks of the date of this letter.

CHANNEL ISLANDS OMBUDSMAN SCHEME

The Channel Islands Financial Ombudsman was established in November 2015. Following the submission of your complaint, if you are dissatisfied at any point in time with the way in which we are dealing with your complaint or have handled your complaint, then (provided that you are an eligible complainant*) you may refer your complaint to:

Channel Island Financial Ombudsman
PO Box 114
Jersey JE4 8TP

website: www.ci-fo.org

email: enquiries@ci-fo.org

telephone: +44 1534 748610 (Jersey local number)

+44 1481 722218 (Guernsey local number)

*an eligible complainant is defined as a “consumer”, “microenterprise” or “certain Channel Islands charities”.

Please note that the Channel Islands Financial Ombudsman scheme only applies to financial service providers involved in banking, lending, money services, insurance, pensions and investments. This means that certain Kleinwort Hambros group companies (namely those involved in the provision of fiduciary services or custodian trustee services) may be outside the scope of the scheme.

CHANNEL ISLAND REGULATORS

Kleinwort Hambros entities in the Channel Islands are licensed and regulated in Jersey by the Jersey Financial Services Commission and in Guernsey by the Guernsey Financial Services Commission. The role of the respective Regulators in Guernsey and Jersey includes ensuring the regulated entities have the appropriate systems and controls to deal with all complaints in an open and transparent manner.

Following the submission of your complaint, if you are dissatisfied at any point in time with the way in which we are dealing with your complaint or have handled your complaint, then (in the event that you are not eligible to refer your complaint to the Channel Islands Financial Ombudsman) you may inform the regulator of the Kleinwort Hambros company from which you are receiving, or have received services:

Jersey Clients

Jersey Financial Services Commission
PO Box 267
14–18 Castle Street
St Helier
Jersey JE4 8TP

telephone: +44 1534 822000

website: www.jerseyfsc.org

Guernsey Clients

Guernsey Financial Services Commission
PO Box 128
Glategny Court
Glategny Esplanade
St Peter Port
Guernsey GY1 3HQ

telephone: +44 1481 712706

website: www.gfsc.gg

IMPORTANT INFORMATION

Kleinwort Hambros is the brand name of SG Kleinwort Hambros Trust Company (CI) Limited which is a company incorporated in Jersey with company number 4345. Registered Office PO Box 197, 18 Esplanade, St Helier, Jersey JE4 8RT. Its Guernsey address is PO Box 86, Hambros House, St Julian's Avenue, St Peter Port, Guernsey GY1 3ED SG. It is regulated by the Jersey Financial Services Commission in the conduct of trust company business and by the Guernsey Financial Services Commission for the provision of fiduciary services. Telephone calls may be recorded.

February 2017

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