

Complaints Management

Summary

Longview aims to ensure that it treats its clients fairly at all times. A complainant should contact us if there is any aspect of the investment services provided by Longview Partners LLP with which they are not satisfied. We take every MiFID complaint seriously and a complaint will be handled in accordance with the relevant FCA rules, which are incorporated within the procedure laid out below.

Contact information

A complainant can submit a MiFID complaint by contacting Andrew Curtis, Interim Head of Compliance, at the following address:

Andrew Curtis
Longview Partners LLP
SavoyStrand
105 Strand
London
WC2R 0AA

Alternatively, via email at compliance@longview-partners.com or via telephone on +44 (0)20 7809 4100.

What is a MiFID complaint?

As a MiFID business, a MiFID complaint is a complaint in relation to the provision of investment services, and where relevant, ancillary services, provided by Longview Partners LLP.

A MiFID complaint is defined by the FCA as ‘any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination which alleges that the complainant has suffered or may suffer financial loss, material distress or material inconvenience’.

Eligible Complainants

A complainant for the purposes of the Firm’s MiFID business includes a “Client”, which includes professional clients and eligible counterparties. In addition, it includes potential clients. Please note that as a MiFID complaint a complaint will not come under the jurisdiction of the Financial Ombudsman Scheme (“FOS”).

Longview only conducts regulated activity for professional clients and eligible counterparties; therefore, Longview will not have any ‘eligible complainants’ as defined in DISP 2.7 of the FCA Handbook.

Complaints Management Procedure

The following procedures detail how Longview Partners LLP will handle a MiFID Complaint.

Responsibilities

The Head of Compliance, with the Compliance Team, are responsible for recording each complaint received by Longview London and the measures taken for its resolution.

Upon receipt of an oral or written expression of dissatisfaction, from a client or prospective client, it is the responsibility of all Longview staff to notify Compliance, in writing, no matter how trivial they may perceive it to be. The following information should be included within the notification:

- Name of complainant;
- Date complaint received; and
- Details of the complaint and complainant.

The Compliance team are responsible for monitoring the effectiveness of any resolution or remedial action decided under this policy.

The Head of Compliance will report any MiFID complaints received during the period under review, and their outcomes, on a monthly basis to the Firm's governing body.

Following the Receipt of a Complaint

On receipt of a complaint, Longview will provide the Client with a prompt written acknowledgement that it has received the complaint and will ensure to keep the complainant informed thereafter of the progress of the measures being taken for the complaint's resolution.

Longview will then investigate the complaint competently, diligently and impartially, obtaining additional information as necessary. We will assess fairly, consistently and promptly:

- the subject matter of the complaint;
- whether the complaint should be upheld;
- the appropriate remedial action or redress (or both); and
- if appropriate, whether we have reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.

Complaints Forwarding Rules

When Longview has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in a complaint, it may forward the complaint, or the relevant part of it, in writing to that other respondent, provided it:

- does so promptly;
- informs the complainant promptly in a final response of the reason to forward the complaint and include the other respondent's contact details; and
- where jointly responsible for the fault alleged in the complaint, Longview must comply with its own obligations under the FCA rules in respect of that part of the complaint it has not forwarded.

Resolution

Following an investigation, Longview will explain to the complainant promptly and, in a way that is fair, clear and not misleading:

- our assessment of the complaint;
- our decision on it, including any remedial action designed to prevent future, similar complaints; and
- an offer of remedial action or redress (in cases where we decide that this is appropriate).

If any offer of remedial action or redress is accepted by the complainant, Longview aims to comply with the offer promptly.

Every effort will be made to resolve your complaint however, if you are not satisfied with our response, you may be entitled to refer your complaint to an alternative dispute resolution entity, as defined in regulation 4 of the ADR Regulations, or you may be able to take civil action.

Regulatory Reporting Rules

Semi-annually, within 30 business days of the end of the relevant reporting periods, Longview will provide the FCA with a complete report concerning MiFID complaints received via the FCA reporting system RegData. The report contains information with regard to the total number of complaints received, closed, upheld by the Firm, as well as outstanding at the beginning of the reporting period, and the total amount of redress paid in respect of complaints.

Training

Training is provided to all staff on an annual basis, and upon joining the firm, and covers the Firm's procedures for identifying and reporting a MiFID complaint.

Record Keeping

Longview retains a record of each complaint received and the measures taken for its resolution for at least five years from the date the complaint was received.

Version Control Record

Date	Version	Updates Made
2013	1.0	Policy creation
2014	2.0	Annual Review and Update
2015	3.0	Annual Review and Update
2016	4.0	Annual Review and Update
2017	5.0	Annual Review and Update
2018	6.0	Annual Review and Update
2019	7.0	Annual Review and Update
2020	8.0	Annual Review and Update
2021	9.0	Annual Review and Update
2022	10.0	Annual Review and Update
12/2023	11.0	Annual Review and Update
02/2024	12.0	Contact information updated

Disclaimer

This material is for your private information, and we are not soliciting any action based upon it. You may not distribute this document, in whole or in part, without our express written permission. This report is not to be construed as an offer to sell or the solicitation of an offer to buy any security in any jurisdiction where such an offer or solicitation would be illegal. The material is based upon information that we consider reliable, but we do not represent that it is accurate or complete and it should not be relied upon as such. Opinions expressed are our current opinion as of the date this information has been provided to you. Whilst we endeavour to update on a reasonable basis the information discussed in this material, there may be regulatory, compliance, or other reasons that prevent us from doing so. Longview specifically disclaims liability for any losses, damages (incidental, consequential or otherwise) that may arise from use or reliance on any information contained herein by you or any other party for any reason.

Longview Partners (Guernsey) Limited is licensed and regulated by the Guernsey Financial Services Commission.

Longview Partners LLP is authorised and regulated in the UK by the Financial Conduct Authority.

Longview Partners (Guernsey) Limited and Longview Partners LLP are each registered in the US with the Securities and Exchange Commission.

Longview Partners LLP • SavoyStrand • 105 Strand • London WC2R 0AA • Tel: +44 (0)20 7809 4100
Longview Partners (Guernsey) Ltd • PO Box 559 • Mill Court, La Charroterie • St. Peter Port • Guernsey GY1 6JG • Tel: +44 (0)1481 712414
For further information, please contact: info@longview-partners.com
www.longview-partners.com