

Introduction

Oldfield Partners LLP (“OP” or “we”) is authorised and regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom. We are required to have in place clear and effective procedures for the reasonable and prompt handling of complaints. This document sets out the complaints handling procedures that we will follow in the event that you make a complaint.

If you are a client of OP and your complaint is about:

- the provision of investment services or ancillary services; or
- the management of a fund

by OP then this may be a “MIFID Complaint” and the complaints handling process in this document will be followed.

Definition of a complaint

A complaint is any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of a complainant about the firm’s provision of, or failure to provide, a financial services activity. A complaint must involve an allegation that the complainant has suffered, or may suffer, financial loss, material inconvenience or material distress.

How can you make a complaint?

You can make a complaint by letter or email. Written complaints should be sent to: The Compliance Officer, Oldfield Partners LLP, 11 Grosvenor Place, London, SW1X 7HH.

E-mail complaints should be sent to jgm@oldfieldpartners.com.

What will we do once we have received your complaint?

We will promptly acknowledge your complaint in writing. In this acknowledgement we will provide the name and title of the person that is handling your complaint. This individual will have the authority necessary to investigate and settle the complaint.

Investigating and resolving your complaint

We will investigate your complaint fairly, consistently and promptly, determine whether the complaint should be upheld, and (if appropriate) determine remedial action and / or redress. We will set out our conclusions in a final response to you. If we decide that redress is appropriate we will aim to provide you with fair compensation for any acts or omissions for which we are responsible. If you accept our offer we will promptly provide the compensation to you.

Our timetable for responding to you

Once we have acknowledged your complaint we will keep you informed of our progress. Within four weeks of us receiving your complaint we will send you either a final response or a written response which explains why we are not in a position to make a final response to you and when we might be expected to provide one.

Financial Ombudsman Service (“FOS”)

If you are an eligible complainant you will be able to refer your complaint to the Financial Ombudsman Service if you are not satisfied with the way we have handled your complaint.

An eligible complainant includes:

- a natural person acting outside his trade, business or profession;
- a business which employs fewer than 10 persons and has a turnover or balance sheet that does not exceed Euro 2 million;
- a charity which has an annual income of less than £1 million; or
- a trustee of a trust which has a net asset value of less than £1 million.

Please refer to Rule 2.7.3 of the FCA’s Dispute Resolution Rules for further details.

Your rights are set out in the FOS’s leaflet “Your Complaint and the Ombudsman” which we will provide to Eligible Complainants as part of the Complaints process. Please remember that if you wish to refer a complaint to the FOS, you must do so within six months of receiving our final response. You should allow us to complete our internal Complaints Procedure before you refer your concerns to FOS. Complainants also have the option of taking civil action.

Closing complaints

We will regard your complaint as closed in the following circumstances:

- once we have sent you a final response; or
- where you have told us in writing that you accept an earlier response that we have sent to you; or
- if you refer your complaint to FOS, when FOS informs us in writing that the complaint has been closed.

OP is committed to ensuring that all complaints received are handled fairly, consistently and promptly and that the Firm identifies and remedies any recurring or systematic problems, as well as any specific problems identified by a complainant.