



# Varramore Partners

Complaints Handling



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## Introduction

Varramore Partners Limited (“Varramore”, “we”, “us”, “our”) aims to ensure that its clients and the clients of its Appointed Representatives (“ARs”) are treated fairly at all times.

If you have an issue regarding your dealings with Varramore or one of our ARs, you may contact us and make a complaint.

Whether your complaint relates to regulated activities (as defined by the Financial Conduct Authority (“FCA”)) or non-regulated activities, Varramore will handle your complaint in accordance with our Complaints Handling Procedure, to the extent relevant.

Handling complaints in a timely and respectful manner is at the centre of our approach to complaints handling. We believe that an effective procedure for handling complaints is a proven way of maintaining and building relationships with the persons upon whom our business depends. Effective complaints handling enables us (a) to demonstrate our commitment to treating our clients and the clients of our ARs’ fairly, (b) to follow both the letter and spirit of the FCA’s rules in relation to dispute resolution and complaints and (c) to minimise the risk of similar issues arising again in the future.

Varramore’s clients and the clients of our ARs are encouraged to make legitimate complaints.

## What is a complaint?

The Cambridge Dictionary defines a complaint, broadly, as “*a statement that something is wrong or not satisfactory*”.

For regulatory purposes, a complaint is defined, under UK MiFID<sup>1</sup>, 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*”. In line with UK MiFID definition of a complaint, the FCA defines a complaint 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*”.

Where Varramore receives any oral or written communication from a client or a client of an AR of Varramore that expresses dissatisfaction, we will – giving due regard to the definitions of complaints outlined above – consider whether or not this oral or written communication should be treated as a complaint. In the event that an oral or written communication is deemed to be a complaint, our Complaints Handling Procedure will, to the extent relevant, be followed.

## How do you make a complaint related to Varramore?

While we recommend that you put your complaint in a durable means (e.g., via email or letter), you can get in touch with us by whatever method suits you best – post, phone or email.

Should you wish to make a written complaint via a letter, please address your letter to:

The Compliance Officer  
Varramore Partners Limited  
The Clubhouse  
Holborn Circus  
20 St Andrew Street  
London  
EC4A 3AG

Should you wish to make a written complaint via email, please do not hesitate to [Contact Us](#).

Should you wish to make an oral complaint via the telephone, please contact us on: +44 (0)203 6375 602.

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<sup>1</sup> Markets in Financial Instruments Directive.

### **How do you make a complaint related to one of Varramore's ARs?**

Where your complaint relates to one of Varramore's ARs, we recommend that – in the first instance – you make your complaint directly to the AR. If one of our ARs receive a complaint, they are required to notify us that they have received a complaint and we will then take all reasonable steps to ensure that the AR handles the complaint in accordance with our Complaints Handling Procedure.

If you do not have the relevant contact details of the AR, please contact us using one of the methods listed above and we can assist you.

In the event that you have already made a complaint to an AR of Varramore and you have not had a response or it has not been handled to your satisfaction or if you deem it is not appropriate to make a complaint directly to Varramore's AR, please contact us using one of the methods listed above.

### **How will your complaint be handled?**

Once received, we will endeavour to handle your complaint in a timely manner. Firstly, Varramore will acknowledge your complaint promptly and keep you informed of the progress of the complaint. We will endeavour to investigate your complaint competently, diligently and impartially. Furthermore, Varramore will endeavour to keep you informed of the measures Varramore (or Varramore's AR) is taking to resolve their complaint. Finally, we will aim to close the complaint in a manner that treats the complainant fairly. A complaint may be regarded as closed once we have sent a final response to you or where you have indicated in writing the acceptance of an earlier response that we have sent to you.

When handling complaints that relate to regulated activities, Varramore will – to the extent relevant – pay due regard to the rules, requirements and guidance set out in the DISP chapter of the FCA's Handbook of Rules and Guidance.

### **Can you complain to the Financial Ombudsman Service?**

If you are an "eligible complainant", as defined in DISP 2.7.3R of the FCA's Handbook of Rules and Guidance, and you are unhappy or dissatisfied with our handling of your complaint, you may be eligible to refer your complaint to the Financial Ombudsman Service ("FOS"). Please note that there is a time limit for referring complaints to the FOS. For further information on the FOS, your eligibility to refer your complaint to them and their contact details, please visit their website at: [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk).

