

Calibrate Management Ltd  
Complaints Policy  
2021

## 1. Introduction

Calibrate Management Ltd (“Calibrate” or “Company”) conducts its business in line with our clients’ best interests.

Although Calibrate’s culture is to ‘get things right the first time’, it is accepted that on occasion a client may feel that the company has fallen short of this aspiration.

It is important to us that any complaint received by Calibrate is responded to in a timely and appropriate manner, not only to comply with any regulatory obligations but so Calibrate can analyse the cause of the complaint and improve the services that we offer to clients.

This policy sets out how Calibrate deals with complaints.

## 2. Complaints handling, oversight and monitoring

Calibrate has established, and maintains, complaints management procedures for the prompt handling of clients’ complaints. The policy has been **endorsed** by the company’s management body.

Calibrate has established a ‘**complaints management function**’ responsible for the investigation of complaints. This role is carried out by the Compliance.

For the avoidance of doubt, **responsibility** for implementation of the complaints management policy and for monitoring compliance with it rests with Calibrate’s **senior management**.

## 3. Making a complaint

A complainant should set out their complaint in writing, providing as much detail as possible, and either post the complaint to:

Head of Compliance  
Calibrate Management Ltd  
4<sup>th</sup> Floor Stratton House  
5 Stratton Street  
London  
W1J 8LA

Or, alternatively, send the complaint by email to: David Charles at [dc@calibrate-partners.com](mailto:dc@calibrate-partners.com)

## 4. Calibrate’s complaints handling process

- All complaints received from a client will be referred to the Compliance Officer.
- All complaints will be acknowledged promptly, confirm receipt of the complaint and that it is being dealt with.

- Where eligible the complainant will be informed that if the complaint is not resolved they may be entitled to refer it to the FOS. In general, this option will only apply when either the company has sent its final position to the complainant *or* when eight weeks have elapsed since the company received the complaint.
- Any complaint will be investigated competently, diligently and impartially, obtaining additional information as necessary.
- The complaint will be assessed fairly, consistently and promptly, giving due attention to the need to determine whether it should be upheld and what remedial action and/or redress may be appropriate.
- The complainant will be kept informed of the progress being made in the resolution of their complaint.
- The company will comply promptly where any offer of remedial action or redress is accepted by the complainant.
- Where relevant, there are time limits after which the FOS cannot consider a complaint. The above communication to an eligible complainant will indicate whether the company consents to waiving these time limits.
- In line with the FCA Handbook (DISP 1.1A.23) Calibrate will endeavour to either:
  - Resolve the complaint within 3 days
  - If resolution will take longer than 3 days, send the complainant a prompt written acknowledgement providing reassurance that it has received the MiFID and is dealing with it, and send updates as appropriate

## 5. Reporting and publication

Calibrate is required to provide a twice-yearly report to the FCA concerning complaints received from eligible complainants.