Complaints Handling Summary

Morningstar Investment Management Europe Limited (the Firm) is regulated by the FCA (reference number 449468) and is a MIFID investment firm, subject to DISP 1.1A on complaint handling requirements. Under DISP 1.1A, the Firm is required to publish the details of the process to be followed when handling a complaint which is outlined in this document.

Complaint Handling Process

Complaints or dissatisfactions can be notified to the Firm free of charge in the following ways to the Firm’s Compliance team which serves as the Complaints Management Function:

In writing: 1 Oliver’s Yard 55–71 City Road London E1Y 1HQ.
Via telephone: 020 3194 1068
By email: EMEACompliance@morningstar.com

Upon the receipt of a complaint, the Complaints Management Function will investigate the complaint completely, diligently and impartially, obtaining additional information from the complainant as necessary. The Complaints Management Function will assess fairly, consistently and promptly:

- The subject matter of the complaint;
- Whether the complaint should be upheld;
- What remedial action and redress (or both) may be appropriate; and
- If appropriate, whether the Firm has reasonable grounds to be satisfied that another firm may be solely or jointly responsible for the matters alleged in the complaint.

If a complaint is forwarded on to another party, the Firm will notify the complainant with a rationale of why the Firm took such an action and provide the other party’s contact details.

The Firm will offer redress, or remedial action, when it is decided this is appropriate and will explain to the complainant promptly, and in a way that is fair, clear and not misleading, the Firm’s assessment of the complaint, the reason for the Firm’s decision and any offer of remedial action or redress. Finally, the Firm will comply promptly with any offer of remedial action or redress accepted by the complainant.

Timing and stages

On receipt of a complaint, the Firm will send the complainant a prompt written acknowledgement that the complaint is being dealt with, usually within one working day unless there are extenuating circumstances.

If the investigation is unusually complex or in cases where there has not been a continuous dialogue with the complainant, the Complaint Management Function may issue a holding letter after four weeks where the matter remains unresolved.

The Firm will issue a final response by the end of the eighth week after the receipt of the complaint but will endeavour to resolve the complaint sooner whenever possible. If the investigation is unusually complex and it has not been possible to send out a final response by the eighth week, the Firm will write to the complainant to inform them of the
reasons and provide a timeframe of when the Firm expects to resolve the matter. It should be noted that the Firm has a regulatory requirement to issue a final notice by the end of the eighth week after receiving the complaint.

**Complaints resolved by close of the third business day**

If the Firm resolves the complaint within three business days, the Firm will provide the complainant with a written summary resolution by way of a final response letter advising that the Firm considers the matter resolved and will contain information of how the complainant can refer their complaint to Alternative Dispute Resolution entity (Financial Ombudsman Service) or should the complainant wish to do so, the ability to take civil action against the Firm.

**Complaints time barring**

The Firm may reject a complaint that is received after the time limits outlined below:

- More than six months after the Firm sent the complainant its final response;
- More than six years after the event complained of took place; and
- More than three years from the date on which the complainant became aware of a cause for complaint.

The Firm would not be required to consider the merits of the complaint under these circumstances, although this would be explained in our final response to the complainant.

**Record keeping**

The firm will keep a record of complaints received and the measures taken for its resolution and retain that record for at least five years where the complaint relates to MIFID business or collective portfolio management services for a UCITS scheme.

**Alternative Dispute Resolution**

The UK Financial Ombudsman Service is approved to act as an alternative dispute resolution entity.

Should a complaint arise between the Firm and a complainant that cannot be satisfactorily resolved, the UK Financial Ombudsman Service provides an independent mechanism for resolution. The contact details are noted below:

**Financial Ombudsman Service**

Address: Exchange Tower, Harbour Exchange, London, E14 9SR
Telephone number: 0800 023 4567
Website: https://www.financial-ombudsman.org.uk/contact-us/complain-online