BNY | INVESTMENTS
NEWTON

COMPLAINTS HANDLING PROCEDURE

November 2025

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Newton Investment Management Ltd (Newton) takes complaints seriously and endeavours to handle all complaints fairly, effectively, and promptly. Newton will ensure complaints from clients and prospects are investigated by an employee of sufficient competence (which will generally be overseen by a manager to maintain impartiality). The person responsible for handling a complaint should have the authority to settle complaints (including the offering of redress where appropriate) or to have ready access to someone who has the necessary authority. Where possible Newton will seek to resolve any complaint by the close of the next business day.

However, if further internal investigations are required, Newton will:

- Send a prompt written acknowledgement providing reassurance that Newton has received the complaint and is dealing with it; and
- Ensure that the complainant is kept informed of the progress of any measures being undertaken to resolve the complaint.

The acknowledgement should include:

- an explanation of why a different person is responding if it is not the person the complaint was addressed to;
- the name and job title of the individual handling the complaint;
- a timescale for when Newton will correspond further; and
- a copy of Newton's complaints handling procedure (this document).

Newton aims to respond to a complaint promptly and in any event to resolve it within eight weeks. Newton's final response letter should do one of the following:

- accept the complaint and, where appropriate, offer redress or remedial action; or
- offer redress or remedial action without accepting the complaint; or
- reject the complaint and give reasons for doing so; and
- if applicable, include a copy of the UK Financial Ombudsman Service's explanatory leaflet.

In the unlikely event that investigations require longer than eight weeks to complete, Newton will write to a complainant and explain why it is not yet in a position to resolve the complaint and indicate when it expects to make further contact.

Should you wish to make a complaint to Newton, please contact us using our Complaints Handling e-mail address; complaints.newton@bny.com

Should a complainant remain dissatisfied after our final response, or after eight weeks, the complainant may be eligible to refer the complaint to the UK Financial Ombudsman Service. The UK Financial Ombudsman Service can be contacted at;

Address: **The Financial Ombudsman Service**
Exchange Tower
London E14 9SR

Telephone: **0800 023 4567 (enquiries and consumer helpline)**

Website: **www.financial-ombudsman.org.uk**

Email: **complaint.info@financial-ombudsman.org.uk**

BNY Investments Newton is the name for a group of affiliated companies that provide investment management services under the trading name of 'Newton' or 'Newton Investment Management'. Investment management services are provided in the United Kingdom by Newton Investment Management Ltd (NIM). NIM is authorised and regulated by the Financial Conduct Authority ('FCA'), 12 Endeavour Square, London, E20 1JN, in the conduct of investment business. Registered in England no. 01371973.