

Fearnley Asset Management AS



Handling of complaints

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Introduction

If you are a client of Fearnley Asset Management AS and are dissatisfied with any aspect of the marketing or administration of your relationship with our personnel or firm, you may complain to us. In order to ensure adequate protection of customers, these guidelines seek to:

- clarify expectations relating to our organization to complaints handling;
- provide guidance on the provision of information to complainants;
- provide guidance on procedures for responding to complaints
- provide internal follow-up of complaints handling (e.g. new internal procedures, employee training, etc).

1. Handling of complaints

Chief Operational Officer (COO) in consultation with the management is responsible for the handling of client complaints at Fearnley Asset Management AS. The client will be informed that only written complaints will be assessed. If the client needs assistance with the drafting of a written complaint, Fearnley Asset Management AS can provide necessary assistance (e.g. the type of information to be provided by the complainant, the identity and contact details of the person or department to whom the complaint should be directed, etc.). A client filing a complaint shall receive written confirmation to the effect that the complaint has been received, that it will be processed, that the client will receive written feedback from the Company as soon as processing of the complaint has been completed, and that such feedback will specify what action the Company will take on the basis of the complaint. Documentation relating to the complaint will be kept on file by Fearnley Asset Management AS for no less than five years after completion of the complaint handling procedure.

2. Registration of complaints

Received complaints will be registered in a client complaint register, and include the following information:

- Date of receipt
- Client identity
- Brief description of the complaint contents
- Date of reply
- An account of the main aspects of the reply
- Whether the complaint has resulted in a need for internal measures

3. Consideration of complaints

All complaints shall be subjected to thorough deliberation by a trained and competent Legal person, during which potential conflict of interest shall be identified and handled.

In considering the complaint Fearnley Asset Management AS will:

- Gather and investigate all relevant evidence and information and perform a comprehensive evaluation of the complaint.
- Communicate in plain language with the client who filed the complaint.
- Provide a reply in respect of the complaint without any unnecessary delay. When an answer cannot be provided within the expected time limits, Fearnley Asset Management AS will inform the complainant about the causes of delay and indicate when the investigation is likely to be completed.

4. Evaluation of complaints

Based on the information emerging in complaints, Fearnley Asset Management AS shall on an on-going basis:

- analyze the information received in the complaints to determine whether such complaints are caused by systematic or fundamental issues at Fearnley Asset Management AS;
- evaluate whether the contents of complaints merit the establishment of new internal procedures, employee training or other administrative measures;
- evaluate whether complaints contains information that should have labour law implications.

5. Regulatory Reporting

Fearnley Asset Management AS will report to each regulator, in accordance with relevant regulations of the jurisdictions in which it operates as an organization, the details of any received client complaints.

6. Complaints - contact details

Client complaints may be forwarded to fam_compliance@fearnleys.com.

If you need assistance to draft a written complaint, please contact us on + 47 22 93 60 00. All complaints will be thoroughly examined. We will revert in writing as soon as we have assessed the complaint.