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Complaints Handling Procedure

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1	<p>Purpose and Scope</p> <p>This procedure sets out how Asquire Wealth Management (AWM) identifies, records, investigates, and resolves complaints in accordance with FCA DISP rules, Consumer Duty requirements, and internal governance standards. It applies to all staff and advisers.</p>
2	<p>Definition of a complaint</p> <p>A complaint is defined as any expression of dissatisfaction, whether oral or in writing, whether justified or not, from or on behalf of an eligible complainant about that AWM's provision of, or failure to provide, a financial services activity. A complaint can be made by a client, a potential client or a person on behalf of either.</p> <p>References to a complaint also include an expression of dissatisfaction which can become a relevant new complaint.</p> <p>Details of AWM's internal complaint handling procedures will be supplied on request to a client and automatically to a complainant when AWM receives a complaint (unless the complaint is resolved by close of business the following day).</p> <p>Complaints will be investigated by a competence and experience complaints handler within AWM, who, where appropriate, was not directly involved in the matter which is the subject of the complaint.</p>
3	<p>Procedures for complaint handling</p> <p>When a complaint is received, details of the complaint along with the original complaint where the complaint is made in writing, will be passed to AWM's Compliance Officer, Danny Lam, within 24 hours of receipt.</p> <p>If the complaint is made over the telephone, a senior member of staff will write to the complainant within 5 business days of the original conversation of the complaint to acknowledge the complaint and confirm AWM's understanding of the client's complaint.</p>
4	<p>Time limits</p> <p>We endeavour to acknowledge complaints as soon as practically possible but generally within 5 business days of receipt. This is basically a holding letter which states that a complaint has been received and sets out the firm's understanding of the nature and details of the complaint. It mentions that the complaint will be investigated as soon as possible and details when and how further contact will be made, together with a copy of AWM's complaint handling procedures.</p>

	<p>Complaints will be dealt with promptly. If the complaint can be resolved within 3 business days of receipt, a final response can be provided within the initial 5 business days and it is possible to combine the acknowledgement of the complaint with the final response.</p> <p>To enable the complaint to be addressed as soon as possible, and within the Treating Customers Fairly initiative, advisers may be required to provide a written report surrounding their recollections of the sale/transaction in question and such reports must be provided promptly having been given suitable priority.</p> <p>If the complaint is not resolved within 4 weeks of receiving the complaint, we will send either a final response or a holding response. The latter will explain why AWM is not yet in a position to resolve the complaint and indicate when further contact can be expected. This should be within 8 weeks of receipt of the complaint.</p> <p>By the end of the 8 weeks after we received the complaint, we must send the complainant either:</p> <p>A final response, or</p> <p>A response which explains why AWM is still not in a position to make a final response, giving reasons for the further delay and indicating when it expects to be able to provide a final response.</p> <p>At this time we must also inform the complainant that they have the right to refer the complaint to the Financial Ombudsman Service (FOS) if they are dissatisfied with the delay and send them a copy of the FOS explanatory leaflet.</p> <p>When investigating a complaint we must ensure that consideration is given to any consequential or prospective financial loss in addition to actual loss.</p>
5	<p>Final response</p> <p>The final response will confirm whether or not we accept the complaint and explain any reasons for the decision. When sending a final response, we will inform the complainant that he may have the right to refer the complaint to the FOS if he is dissatisfied with the final response and he must do so within 6 months. We will enclose a copy of the FOS explanatory leaflet (unless it has done so previously)</p> <p>Where we decide that redress is appropriate, we will aim to provide fair and appropriate compensation for any acts or omissions for which we are responsible and comply with any offer of redress which the complainant accepts.</p>

6	<p>Controls</p> <p>There must be appropriate management controls and AWM must take reasonable steps to ensure that, in complying with the FCA complaint handling rules, we handle complaints fairly, consistently and promptly and that it identifies and remedies any recurring or systemic problems, as well as any specific problem identified by a complaint.</p>
7	<p>Complaint record keeping and reporting.</p> <p>We will retain records of complaints for a minimum period of three years from the date of its receipt of the complaint.</p> <p>These records will include:</p> <p>The name of the complainant,</p> <p>The substance of the complaint, and</p> <p>Any correspondence between AWM and the complainant, including details of any redress offered by AWM.</p> <p>Our complaints register is to be updated to reflect the situation and the Financial Conduct Authority (FCA) will be updated on any complaints twice a year.</p>
8	<p>Complaints on investment performance from clients</p> <p>There may be instances in which complaints made by investors in life funds, unit trusts, OEICs or UCITS are in reference to investment performance (as distinct from sales practices). Although investment performance is not grounds for a regulatory complaint, we expect advisers to record the complaints they receive, and we will follow our Complaints Handling Procedure accordingly.</p>