

SQUIRE PATTON BOGGS (UK) LLP

COMPLAINTS HANDLING PROCEDURE

- 1 This document sets out the procedure for dealing with complaints at Squire Patton Boggs (UK) LLP (trading as "Squire Patton Boggs") ("SPB"): primarily, client complaints (for example, in respect of alleged poor service or a disputed bill), but also third party complaints (for example, in respect of delay or alleged professional misconduct).
- 2 SPB was formerly named "Hammonds LLP", "Squire, Sanders & Dempsey (UK) LLP" and "Squire Sanders (UK) LLP" and formerly traded as "Hammonds", "Squire Sanders Hammonds" and "Squire Sanders" respectively.
- 3 Clients should feel free to raise complaints or concerns, in respect of any matter on which they instruct SPB, or any bill, with the SPB Relationship Partner (whose details will be set out in the relevant Engagement Letter).
- 4 Some clients may also be eligible to make a complaint to the Legal Ombudsman ("LeO") (see below); however, the client must generally first exhaust SPB's internal complaints procedure, as described in this document, either after or instead of an initial complaint to the Relationship Partner.

Complaints made under this procedure should be made in writing to the Complaints Handling Partner, Charles Frost, by email at charlie.frost@squirepb.com or by post to Charles Frost, Squire Patton Boggs (UK) LLP, Rutland House, 148 Edmund Street, Birmingham, B3 2JR. Please note that we will not accept or discuss complaints by telephone; this is because we have no facility to routinely record telephone calls.

- 5 As a minimum, written complaints should include the following information:
 - the complainant's name, status (ie: client; agent for or representative of client; etc) and contact details;
 - the name of the matter (as shown on the relevant SPB Engagement Letter or bill);
 - the name of the SPB Relationship Partner, and names of any other relevant SPB lawyers or legal staff if known; and
 - a description of the complaint being made.

The Complaints Handling Partner may need to request further information or documents in order to consider the complaint.

- 6 The Complaints Handling Partner will aim to write to acknowledge a client complaint within 3 working days of receiving it. That acknowledgement will include:
 - a statement of his understanding of the complaint, which may include a request for additional information or documents;

- the anticipated timeframe for dealing with the complaint; usually this will be a commitment to investigate the matter and to respond within a further 5 working days either in full or, if that is not possible (for example, because of the complexity of the matter or unavailability of relevant individuals) to give an indicative timetable for responding to the complaint in full;
- details of the rights which the client may have, and the procedures which it should follow, to complain to external regulators such as LeO; and
- a copy of this complaints handling procedure document.

7 SPB takes client complaints seriously, and will carefully consider, and fully respond to, all client complaints properly made to the Complaints Handling Partner, provided that the complaint is made within 12 months from the date of the problem occurring or the date when the client should reasonably have become aware of it, if later.

8 LeO can address complaints only if made by a client, or in certain circumstances a prospective client, who or which is:

- an individual;
- a charity, club or trust with a net annual income or asset value (as applicable) of under £1 million;
- a micro-enterprise, ie a business with fewer than 10 employees and an annual turnover and balance sheet both under €2 million;
- a Personal Representative or Beneficiary of the estate of a person who before they died had not referred the complaint to the Ombudsman.

Usually, complaints to LeO must be made within one (1) year from the date of the problem occurring, or one (1) year from the date when the complainant should have known about the complaint. Please note LeO has a discretion to accept out of time complaints in circumstances where it is deemed "fair and reasonable" to do so. Generally, a complainant must first exhaust the firm's complaints handling procedure; but if a complaint has not been resolved to the complainant's satisfaction within 8 weeks of its being made to the Complaints Handling Partner, then the complainant may, within 6 months after receiving the firm's final written response to the complaint (or within 6 months after the expiry of that 8 week period, if applicable) ask LeO to review the complaint. Details of the procedure for doing so are given on the LeO website at www.legalombudsman.org.uk, or you can telephone LeO on 0300 555 0333, email to enquiries@legalombudsman.org.uk or write to The Legal Ombudsman, PO Box 6167, Slough, SL1 0EH. Note LeO have a discretion to dismiss or discontinue complaints in certain circumstances and may decline to issue a decision.

9 A client may apply to the courts for an assessment of a disputed bill under Part III of the Solicitors Act 1974; please note that LeO may not be prepared to consider a complaint about a bill if the client has applied to the court for assessment.

- 10 Any person (whether a client or otherwise) may complain to the Solicitors' Regulation Authority about alleged professional misconduct on the part of a solicitor. The procedure for doing so is detailed on the website www.sra.org.uk.
- 11 SPB does not make any commitment to respond within any particular timescale, or at all, to third party complaints, and may not do so if they are reasonably perceived to be spurious or vexatious. However, SPB will consider and respond to third party complaints which it perceives to raise a valid concern regarding the conduct of SPB or any of its staff.
- 12 We are obliged to tell you that alternative complaints bodies such as ProMediate (www.promediate.co.uk) exist which are competent to deal with complaints about legal services, should both you and SPB wish to use such a scheme. However, SPB will not agree to use such a scheme.
- 13 Please note that any personal data sent or disclosed to, or otherwise obtained by, SPB in the course of the making or considering of a complaint will be processed, retained and/or deleted in accordance with our Privacy Notice for our EU offices ("**EU Privacy Notice**") published on the Squire Patton Boggs website at www.squirepattonboggs.com.