

Investment Bank Limited

External Complaints Policy

Effective Date: December 2021

1. Purpose

This Policy details how Investment Bank Limited (“Investment Bank Ltd”) and its associated companies will deal with complaints when carrying out its business.

2. Scope and Applicability

This Policy covers all of Investment Bank Ltd operations in the UK, and any of its affiliates providing services to it. All relevant Investment Bank Ltd staff have a requirement to ensure that complaints from clients or potential clients are properly handled.

Investment Bank Ltd is authorized by the Financial Conduct Authority (FCA) and, as such, will act in accordance with the Complaints rules as defined in the FCA Handbook, which will take precedence over the requirements of this Policy.

3. What is a Complaint?

A complaint is a clear expression of dissatisfaction made orally or in writing from, or on behalf of, a client or our counterparty about Investment Bank Ltd.’s provision of financial services, failure to provide a financial service to the standard expected or issues relating to a particular trade.

A complainant can be a Professional client or Eligible counterparty. Investment Bank Ltd does not deal with Retail clients. Eligible complainants can refer their complaints on to the Financial Ombudsman Service.

4. Responsibilities

4.1. Management Body and Compliance Responsibilities

- a. The Management Body of Investment Bank Ltd are responsible for the implementation of the Complaints Policy and for monitoring compliance with it.
- b. The Chief Compliance Officer deals with complaints.

4.2. Employee Responsibilities

All employees are expected to refer any verbal or written complaints to the Chief Compliance Officer at the earliest opportunity and to cooperate fully with the investigations.

4.3. General Responsibilities

Clients and potential clients can submit complaints free of charge. Complaints will be handled promptly, effectively and in an independent manner, obtaining additional Information as necessary. Investment Bank Ltd will always communicate with clients and potential clients clearly in plain language that is easy to understand and will reply to the complaint without undue delay.

Investment Bank Ltd will assess fairly, consistently and promptly:

- The subject matter of the complaint.
- Whether the complaint should be upheld.
- What remedial action or redress may be appropriate; and
- Whether another party may be solely or jointly responsible for the matter alleged in the complaint.

Factors that may be relevant in the assessment of a MiFID complaint include the following: All the evidence available and the particular circumstances of the complaint; similarities with other complaints received by Investment Bank Ltd;

- Relevant guidance published by the FCA, other relevant regulators, the Financial Ombudsman Service or former schemes; and
- Appropriate analysis of decisions by the Financial Ombudsman Service concerning similar complaints received by Investment Bank Ltd.

Investment Bank Ltd will promptly comply with any offer or remedial activity or redress accepted by the complainant. Investment Bank Ltd will consider a complaint closed when it has issued a final response.

If a complaint is referred to the Financial Ombudsman Service, Investment Bank Ltd will cooperate fully with the Financial Ombudsman Service and comply promptly with any settlement or awards made by it.

5. Timelines

On receipt of a complaint Investment Bank Ltd will send the complainant a written acknowledgement within 24 hours (unless exceptional circumstances delay this) providing confirmation that it has received the complaint and is dealing with it.

Investment Bank Ltd will ensure that the complainant is kept informed of the progress of the measures being taken for resolution of the complaint. Investment Bank Ltd will write to complainants after four weeks if it has not reached a decision. Investment Bank Ltd will issue a final response to the complainant within eight weeks and inform the complainant, if eligible, about their options for onward referral to the Financial Ombudsman Service.

If Investment Bank Ltd resolves the complaint by close of business on the third business day following the receipt of the complaint then Investment Bank Ltd will issue a final response to the complainant, advising that it considers the complaint as resolved and inform the complainant about their options for onward referral to the Financial Ombudsman Service. In these circumstances, there will not be a requirement to issue a holding letter or final response letter.

Investment Bank Ltd may promptly forward the complaint in writing to another party if they have reasonable grounds to believe that the other party may be solely or jointly responsible for the matter alleged in the complaint. If a complaint is forwarded, Investment Bank Ltd will inform the complainant promptly in a final response of why the complaint has been forwarded to another party and provide the complainant with the other party's contact details.

If Investment Bank Ltd receives a forwarded complaint, the complaint will be treated as if Investment Bank Ltd has received the complaint directly and the same time limits will apply from the date on which Investment Bank Ltd has received the forwarded complaint.

6. Complaints time barring

If Investment Bank Ltd receives a complaint which is outside the time limits for referral to the Financial Ombudsman Service, it may reject the complaint without considering the merits but will explain this to the complainant in its final response.

The Financial Ombudsman Service will not consider a complaint if the complainant refers it to the Financial Ombudsman Service:

- More than six months after the respondent sent the complainant its final response.
- More than six years after the event complained of.
- More than three years from the date on which the complainant became aware that he had cause for complaint.

7. Record keeping

Investment Bank Ltd will keep a record of each complaint 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 three years for all other complaints from the date the complaint was received.

8. Review of Policy

This Policy will be reviewed regularly, at least once a year, and amended as considered necessary by Investment Bank Ltd.'s Management Body in the event of changing circumstances or regulations.

9. Financial Ombudsman Service

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

Tel: 0800 023 4567 (free for most people ringing from a fixed line) or 0300 123 9123 (cheaper for those calling using a mobile) or 44 20 7964 0500 (if calling from abroad)

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

Website: www.financial-ombudsman.org.uk