

Complaints Management Policy

RIA Capital Markets Ltd (“RIA”)

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Introduction

RIA is a firm carrying out MiFID business authorised by the Financial Conduct Authority (“FCA”) and required to have in place clear and effective procedures for the reasonable and prompt handling of complaints.

An effective complaints management system is a proven way of maintaining and building relationships with the people on whom the business depends. RIA views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the complainant.

Handling complaints well:

- demonstrates a commitment to provide the best possible service to our clients and other stakeholders;
- helps the firm to recognise things that have gone wrong (so they can be corrected); and
- helps prevent things going wrong again.

This document sets out the complaints handling policy that the firm will be bound to in the event of a client’s complaint.

Our policy is to:

- provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint;
- publicise the existence of our complaints procedure so that people know how to contact us to make a complaint;
- ensure everyone at RIA knows what to do if a complaint is received;
- ensure all complaints are investigated fairly and in a timely manner;
- ensure that complaints are resolved and client relationships repaired; and
- gather information that helps us improve what we do.

This Policy will be reviewed at least annually and amended as necessary.

Definition of a Complaint

A complaint is any expression of dissatisfaction about any aspect of RIA or any of its services. A complaint can be received verbally, in person or by phone, or in writing (including by email).

Complaints may come from all types of clients, including retail, professional and eligible counterparties. Complaints must be processed by RIA free of charge.

This Policy does not cover complaints from staff (unless such complaints are in relation to the staff member being a client of the firm), who should use RIA’s Discipline and Grievance policies.

How can a complaint be made/received?

Complaints should be directed to the complaints management function at RIA which can be contacted via email at lorna.hay-smith@ria.co.uk or via post to Lorna Hay-Smith, RIA Capital Markets Ltd, 91 George Street, Edinburgh, Midlothian, EH2 3ES.

What is an Eligible Complainant?

An eligible complainant is a:

- “consumer”, being a natural person acting for purposes outside his trade, business or profession. An elective professional client that is a natural person (an individual) would fall within the definition of consumer;
- “micro-enterprise”, being an enterprise that employs fewer than 10 persons and has a turnover or annual balance sheet that does not exceed €2 million;
- charity which has an annual income of less than £1 million at the time the complaint is made; or
- trustee of a trust which has a net asset value of less than £1 million at the time the complaint is made.

Availability of RIA’s Complaints Policy and provision of summary of details

RIA will publish this Policy on its website. This Policy will also be provided to clients upon written request and at any time the firm acknowledges a complaint.

A complaints management function has been established in RIA to be responsible for the investigation of complaints. The compliance team will be responsible for monitoring the process of complaint handling. As part of the general compliance reporting to the board/management body, the compliance team will submit summaries of its findings on complaints at least annually.

RIA will provide its clients with summary details of its internal complaints handling procedures which will explain:

- how it fulfils its obligation to handle and seek to resolve complaints;

This information will be provided to the client:

- on request;
- when acknowledging a complaint;
- in the terms and conditions agreed with the customer;
- on any customer facing website.

Details of RIA’s complaints handling procedures can be found in Appendix A of this Policy.

Financial Ombudsman Service (“FOS”)

Any complaint made by an eligible complainant will follow the general procedure. In the event that the client(s) is not satisfied with the outcome of our final Response Letter, which will include the FOS leaflet, the client will be eligible to take the complaint to the FOS.

Financial Ombudsman Service

Exchange Tower

London

E14 9SR

website: www.financial-ombudsman.org.uk

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

phone: 0800 023 4567 or 0300 123 9123 (or +44 20 7964 0500 if calling from abroad)

Data Handling and Record Keeping

All complaint information will be handled sensitively, telling only those who need to know and following all relevant data protection requirements.

RIA will maintain a record of all complaints received, the investigations, and the measures taken for their resolution. This will be kept for a minimum period of five years for all complaints from the date the complaint was received.

Appendix A:

Complaints Handling Procedure

When a complaint is received, a procedure should be followed:

- If the complaint is verbal and you can settle it immediately you should do so and inform the Compliance Officer (it will need to be followed up in writing).
- If the complaint is in writing you should:
 - advise the Compliance Officer immediately;
 - appoint an individual of sufficient seniority to investigate and respond to the complaint, or where necessary ensure sufficient escalation.

Where we receive a complaint we must:

- Investigate the complaint competently, diligently and impartially, obtaining additional information where necessary;
- Assess fairly, consistently and promptly the subject matter of the complaint, whether the complaint should be upheld and what remedial action or redress (or both) may be appropriate; and
- Comply with any offer of remedial action or redress accepted by the complainant.

Additionally, on receipt of a complaint, we must:

- Send the complainant a prompt written acknowledgement providing early reassurance that we have received the complaint;
- Ensure that the complainant is kept fully informed thereafter of the progress of the measures being taken for the complaint's resolution.

When handling the complaint, we must be mindful to communicate with clients in plain language that is easily understood. We do not charge any fees in relation to complaints received.

By the end of eight weeks (unless the complainant has already accepted a response), we are required to send either a "final response" or a "written response".

A "final response" will be a written response from us which:

- Accepts the complaint and, where appropriate offers redress or remedial action; or
- Offers redress or remedial action without accepting the complaint; or
- Rejects the complaint and gives reasons for doing so.

Where we are not in a position to issue a "final response", we will, within the eight week time period issue a "written response" which:

- Explains why we are not in a position to make a final response and will indicate when we expect to be able to provide a final response.