

Complaints Management Policy

RIA Capital Markets Ltd (“RIA”)

February 2018

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.

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, Conference House, 152 Morrison Street, Edinburgh, Midlothian, EH3 8EB.

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.

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.

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

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

RIA will maintain records of the complaints received, the investigations and the final outcomes for a period of five years.