Complaint Procedure

1. Introduction

UNLU Merchant Bank Limited's ("UNLU Merchant Bank") endeavours and commits to always providing clients with the highest level of service. We work very hard to ensure that is the case. However, we understand that there may be occasions when clients' expectations may not be met.

UNLU Merchant Bank understands the importance of complaints and hence, views complaints as an opportunity to learn lessons and to improve its services further, while making things right for the clients.

2. How to make a complaint

If you are dissatisfied with the services of UNLU Merchant Bank and wish to make a complaint, you can do so in multiple ways. Please let us know about your dissatisfaction by:

- Emailing to the dedicated address: ukcompliance@unluco.uk
- Speaking to your usual UNLU Merchant Bank contact via telephone. Please note that as part of our commitment to quality service, telephone calls may be recorded.
- Writing to us at this address:

Compliance Officer
UNLU Merchant Bank Ltd
53 Davies Street
London
W1K 5JH
United Kingdom.

Complaints can be submitted free of charge.

3. Complaint handling framework

UNLU Merchant Bank has established and implemented Complaints policy and procedures (as summarized herein) to ensure the appropriate, fair, transparent and effective registration, management and resolution for all complaints that are received from the 'eligible complainants' within the scope of the FCA's DISP rules.

Our internal complaints framework and procedures:

- allow complaints to be made free of charge by eligible complainants by any reasonable means;
- recognise complaints as requiring resolution;
- outline the complaint handling process, including timelines and stages;
- identify, analyse and address the root cause of the complaint; and

- record all details of the complaint and respective outcome.

UNLU Merchant Bank uses the information gathered from dealing with complaints that relate to MiFID business in order to meet its regulatory compliance obligations to monitor the adequacy and effectiveness of its measures and procedures to detect and minimise any risk of compliance failures.

UNLU Merchant Bank fully and carefully takes into account the FCA Principle 6 (Customers' Interests), Principle 7 (Client Communications) and Principle 12 (Consumer Duty) when it identifies problems, root causes and/or compliance failures that are not necessarily related to client complaints.

4. Once a complaint is made

When a complaint is received, we will seek a resolution as quickly as possible. If we receive a complaint outside normal working hours in the UK time zone, it will be treated as if it has arrived the next business day.

When dealing with your complaint, we will ensure the following:

- Proper registration of your complaint in our records;
- Prompt acknowledgment of your complaint in writing to you, following its receipt.
- Where possible, if we can resolve the complaint promptly, we will provide you with a full response within the acknowledgement letter/email.

5. Complaints that require further investigation

We aim to resolve complaints as quickly as possible. If a decision is not reached in time of the acknowledgement letter/email, or it is necessary to carry out additional investigation, we will explain why and provide you with a revised timeline in our holding letter/email to you.

For most complaints, we will provide a final response within eight weeks of receiving the complaint. Where specific FCA rules prescribe a shorter timeframe for a particular type of complaint, we will comply with the applicable regulatory timeframe. However, in the unlikely event that we have not completed investigating your complaint after 8 weeks after we received it, we will send you a further holding letter/email that will:

- Explain the reasons why we have not been able to reach a final decision;
- Inform you know when you can expect our final decision;
- If eligible, provide contact details for an Alternative Dispute Resolution party, such as the Financial Ombudsman Service, and explain their role and service.

6. Our final decision and response

Once we have fully investigated your complaint, we will write to you confirming our final decision on that matter and how it was reached. The final response is our written decision and response to your complaint that:

Either:
(a) accepts the complaint and, where appropriate, offers redress or remedial action; Or
(b) offers redress or remedial action without accepting the complaint; Or
(c) rejects the complaint and gives reasons for doing so;
And which:
(d) encloses a copy of the Financial Ombudsman Service standard explanatory Leaflet;
(e) provides the website address of the Financial Ombudsman Service;
(f) informs you that if you remain dissatisfied with our final response, you may refer the matter to the Financial Ombudsman Service (see below section); and
(g) indicates whether or not we consent to waive the relevant time limits in FCA DISP Sourcebook 2.8.2R or DISP 2.8.7R. (Was the complaint referred to the Financial Ombudsman Service in time?).

The Financial Ombudsman Service Leaflet means *"Your complaint and the Ombudsman"* document that is available by reference to the Financial Ombudsman Service website: http://www.financial-ombudsman.org.uk/publications/consumer-leaflet.htm

7. Alternative Dispute Resolution

We would like to inform you that alternative dispute resolutions may be available to you (if eligible), and you may refer the matter to such a dispute resolution body in the UK - The Financial Ombudsman Service (FOS) whose details are below:

Financial Ombudsman Service
Exchange Tower, London, E14 9SR, United Kingdom.
Website: www.financial-ombudsman.org.uk
Telephone: 0800 023 4567 or 0300 123 9123

FOS is a free service that settles complaints between eligible complaint (consumers) and businesses that provide financial services.

If you wish to refer the matter to the FOS, you should do so within 6 months, after receiving our final response. The FOS has the discretion whether or not to review the matter referred to it after this deadline.

8. Complaints not relating to UNLU Merchant Bank UK Limited

If we receive a complaint that is not about us or our services/products, we will inform you that we are not responsible for the matter.

Where reasonable and possible, we will inform you who the responsible firm is and/or will forward your complaint to that firm. Please note that you should liaise with such firm directly in relation to your complaint.

9. Confidentiality

UNLU Merchant Bank will handle all complaint information sensitively, responsibly and in accordance with the relevant data protection laws and regulatory requirements.

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