

1. SCOPE

The Complaints Policy (the “**Policy**”) applies to all Staff, which includes contractors for service and temporary staff working for Sigma Broking Limited (the “**Company**”), and where applicable, its associated trading names.

References in this Policy to the “Company” shall include Associated Companies unless expressly otherwise specified, or where the context provides otherwise.

For the purposes of this Policy:

Associated Companies means in relation to the Company, another company which is from time to time an affiliate, subsidiary, or subsidiary undertaking of, or a holding company or parent undertaking of, or another subsidiary or subsidiary undertaking of a holding company or parent undertaking of, the Company or any Limited Liability Partnership or other vehicle or entity to which the Company transfers any part of its business. The expressions “Subsidiary” and “Holding Company” shall have the meaning ascribed to them by section 1159 of the Companies Act 2006 and “Parent Undertaking” and “Subsidiary Undertaking” shall have the meanings ascribed to them by section 1162 of the Companies Act 2006.

Customer means clients and counterparties of the Company.

FCA means the Financial Conduct Authority, the home state regulator of the Company.

Staff means consultants, contractors, temporary staff, brokers, employees, and other individuals, such as trainees, apprentices, homeworkers, casual staff, and volunteers working for the Company.

2. ROLES AND RESPONSIBILITIES

The Compliance Department is responsible for managing complaints and monitoring of the complaints handling process. This process is managed by the Company’s Head of Compliance.

3. PURPOSE

The Company is authorised and regulated by the UK Financial Conduct Authority as a MiFID investment firm. The Policy has been drafted in accordance with the UK version of MiFID II Directive 2014/65/EU¹, Under these regulations, the Company must ensure:

- the Compliance Department reports to the management body, at least annually, on the implementation and effectiveness of the overall control environment for investment services and activities, on the risks identified and on complaints handling as well as remedies undertaken.
- the Compliance Department monitors the operations of the complaints handling process and consider complaints as a source of relevant information in the context of general monitoring responsibilities;
- when handling a complaint, the Company must communicate, in plain language, that is clearly understood, and provide a response without any unreasonable delay. The communication must explain the Company's position and inform the Customer of their options, and that they may be able to refer the complaint to an ADR entity² or take civil action;

¹ Please refer to Article 26 of the UK version of the Commission Delegated Regulation (EU) 2017/565.

² Alternative Dispute Resolution (ADR) entities are out-of-court (non-judicial) entities. They involve a neutral part (e.g. a conciliator, mediator, ombudsman, complaints board etc.) who proposes a solution or brings the relevant parties together to help find a solution.

- the Company has established, implemented and maintains effective and transparent complaint management policies and procedures for the prompt handling of Customer complaints (and potential complaints);
- the Company keeps a record of the complaints received and the measures taken for their resolution.
- the Company maintains a Complaints Policy that is clear, accurate and up to date and is endorsed by the management body.
- the Policy shall be provided to Customers or potential Customers upon request and must be free of charge.
- the Compliance Department must analyse complaints, and complaints handling data, to ensure that they identify and address any risks or issues.
- the Company must establish a complaint handling function and shall publish the details of the process including contact person. For the purposes of this requirement, the complaints handling function will be the Compliance Department.

The Company's Customers are not subject to the FCA's complaints procedure in relation to a Customer's ability to make use of the FCA's Compensation Scheme as the Company is only authorised to support wholesale Customers (and not retail clients).

4. DEFINITION OF A COMPLAINT

4.1 What is a Complaint?

A complaint, for the purposes of this Policy, includes a clear and formal expression of dissatisfaction made verbally or in writing (including email) from, or on behalf of, a Customer about a service provided by the Company ("**Complaint**").

Whilst not exhaustive, the following should be considered as complaints:

- a member of the Customer's senior management, Legal or Compliance department making a verbal complaint;
- any complaint, in writing, that is formally addressed to the Company's Legal, Compliance and/or senior management;
- any reservation of legal rights or indication to escalate the matter;
- any indication that the Company may have breached its contractual or regulatory obligations; and/or
- an indication that the Company is failing on a material or persistent basis in the provision of its services.

4.2 Routine Issues that are not a Complaint

For the purpose of this Policy, one should exclude cases where Customers have informally expressed concerns about issues regarding the Customer's services which can be routinely handled by the relevant function (for example, by the Broker desk or Operations team dealing with an operational malfunction).

Please note that correspondence with a Customer, involving their Legal or Compliance Department should likewise include a member of the Company's Compliance team for assistance as appropriate.

For the avoidance of doubt, please consult the Compliance Department regarding any aspect of this Policy.

5 FILING A COMPLAINT

Customers must submit complaints in writing via the contact details below:

If by email: compliance@sigma-broking.com

If by letter: Compliance Department, Sigma Broking Limited, 20th Floor, 125 Old Broad Street, London EC2N 1AR

The Complaint must include the following information to be deemed complete:

- the name and contact details of the complainant;
- a description of the order, operation or service concerned/planned or the difficulty giving rise to the complaint;
- the nature of the complaint with as much information as possible including references to any particular breach; and
- the exact time and date of the event leading to the complaint.

6 ESCALATION PROCESS FOR COMPLAINTS

The following illustrates the escalation process relating to how the Company should deal with Complaints:

- a) when a Complaint is first received, the Staff member receiving the Complaint should treat the complainant courteously and capture sufficient details of the Complaint.
- b) if the Staff member handling the Complaint independently considers a Complaint as being unjustified, this shall not constitute grounds for failing to escalate the Complaint in accordance with this Policy.
- c) if a Customer complains orally about the Company's service, they should be encouraged to put their complaint in writing with a copy addressed to the Company's Compliance Department, who are responsible for analysing Complaints and Complaints handling data to ensure that any risks or issues are addressed and identified.
- d) on receipt of a Complaint, reasonable efforts should be made to ensure that the Customer receives an acknowledgement in writing from the Company's Compliance Department within five (5) business days, and shall include an indication of the timeframe within which the Company will provide a full response (for example due to the complex nature of a particular Complaint);
- e) all Complaints should be treated confidentially and should not be discussed with any other member of Staff except where necessary as part of the review and resolution process;
- f) all Complaints received by the Company need to be formally recorded by the Compliance Department in the Complaints Register;
- g) complaints will be investigated by or, be under the direct supervision of, the Compliance Department;
- h) once the Complaint has been reviewed by the Compliance Department and relevant management, and subject to paragraph i) below, reasonable efforts should be made to ensure that a response is issued within fifteen (15) business days of receipt of the Complaint. The response must be communicated in plain language that is clearly understood, explain Company's position and inform the Customer of their options in accordance with the relevant contractual arrangement with the Company.
- i) the Compliance Department must report to the board of the Company at least annually on complaints handling as well as remedies undertaken.

7 REQUIREMENTS FOR STAFF

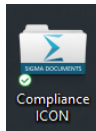
All Staff are trained to clearly identify Complaints received and to follow the Complaints handling process as described in this Policy.

Staff who receive a complaint from a Customer, or a former Customer, must immediately notify their line manager and the Compliance Department.

Staff are reminded that any communications, including correspondence, memoranda, notes, emails, recordings of telephone calls may be required to be disclosed in any subsequent litigation or regulatory proceeding.

In the event of a Complaint, documents relating to the complainant or the complainant's affairs should not be destroyed unless authorised by the Compliance Department.

This Policy is available on the Company's website: www.sigma-broking.com and for all Staff, under the Compliance ICON tab on their work desktop:



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Any queries, or requests for further information relating to this Policy should be addressed to the Company's Compliance Department at compliance@sigma-broking.com.

Version Control

Document Owner: Compliance

Version No.	Date	Version Author	Approved by	Approval Date	Revisions/Changes
V1	May 2024	Compliance	Board of Directors	May 2024	New document