

Complaints Procedure Summary

Winterflood is committed to providing the highest level of client service but we acknowledge that despite our best efforts there may be instances whereby you are dissatisfied with some aspect of our service. Although we are never happy to learn that you feel we have fallen short, we appreciate the opportunity to put things right and address any issues to prevent them recurring in future.

We greatly value your comments and we consider complaints to be a key indicator of how we are treating our clients, and how we can improve our service by ensuring that the root cause of any complaint can be minimised or eradicated. We operate a firm-wide Complaints Policy which requires that complaints are dealt with by our designated complaints management function, overseen by a member of our senior management team. All complaints must be dealt with promptly, investigated in a diligent and unbiased manner, and the complainant kept informed in communications that are timely, clear, and written in plain language.

This document sets out the ways in which you can make a complaint to us and provides a summary of the process we will follow to investigate the complaint and communicate our progress and the outcome of our investigation to you.

How to make a Complaint

If you are dissatisfied with any aspect of our service and would like to make a complaint then we would like to hear from you. You can do this in any of the following ways:

- Call us on +44 (0)203 100 0000
- Send us a secure email to complaints@winterflood.com; or
- Send us a written complaint by post to the following address:

Compliance Department
Winterflood Securities Limited
The Atrium Building, Cannon Bridge House
25 Dowgate Hill
London
EC4R 2GA

Submitting a complaint is free of charge.

To help us ensure that we are able to address your complaint as quickly as possible, please make sure that you detail the following if your complaint is in written form:

- Your full name and address
- The full details of your complaint
- How you would like us to remedy the issue
- A daytime contact telephone number.

How we will deal with your complaint

Upon receipt of your complaint we will record all the relevant details. We will then thoroughly investigate your complaint using all the information available to us. In some cases we may need to contact you to gather further information to assist our investigation. We commit to assessing your complaint diligently and impartially and reaching a fair decision.

In the first instance, we will endeavor to resolve your complaint by the close of the third business day following the date we receive your complaint. In this case, we will send you a summary confirming that we consider your complaint to be resolved. If we are unable to resolve your complaint within three business days because it requires further investigation, we commit to the following:

- We will send you a written acknowledgment as soon as possible and in any circumstances **within 5 working days of receipt**.
- We will make every effort to investigate and resolve your complaint as quickly as possible and without undue delay. Once we have completed our investigation we will write to you setting out our position and, where appropriate, our proposed remedial action (this communication shall be referred to as our “final response”).
- If we have been unable to resolve your complaint within 4 weeks we will write to you keeping you informed of the progress that has been made.
- In exceptional cases, where we have not been able to provide our final response within 8 weeks, we will write to you explaining why we are not yet able to give our response and provide a time frame in which we expect to be in a position to provide it.

If we do not provide you with a final response within eight weeks from the date we received your complaint, or if you do not agree or are dissatisfied with the outcome of our investigation, you may have the right to refer your complaint to the Financial Ombudsman Service, which is an independent dispute resolution service. You can check your eligibility to use the Financial Ombudsman Service by consulting their website.

The Financial Ombudsman Service can be contacted at: The Financial Ombudsman Service, Exchange Tower, Harbour Exchange Square, London E14 9SR, or via its website at www.financial-ombudsman.org.uk, or by phone on 0800 0234 567.

In addition to the availability of the Financial Ombudsman Service, any complainant may be able to take civil action.