



Regulatory Compliance Policy

Last review date:	Reviewed by:	Next review date:
28 Feb 2024	Alex Iakobachvili (@alia) – Compliance Officer	28 Feb 2025

Complaints Handling Policy

Responsibility & Governance

LHCM Standards:

- The Company ensures that its people uphold the highest standards of professionalism, that they protect the firm and deliver consistently good outcomes for our customers
- The Company pays due regard to the interests of all its customers, in particular those that may be vulnerable, and treats them fairly

Financial Conduct Authority (FCA) / FSMA

Legislation or other requirements:

- Commission Delegated Regulation (EU) 2017/565 (the “Delegated Regulation”) is Article 26.
- FCA Handbook are Principles 3 and 6, DISP 1.1A and DISP 1.10

Other standards:

Financial Ombudsman Service

Purpose

LHCM (the “Company”) is committed to providing a quality service for its customers and working in an open and accountable way that builds the trust and respect of all our stakeholders. One of the ways in which we can continue to improve our service is by listening and responding to the views of our staff, customers, and stakeholders, and in particular by responding positively to complaints, and by putting mistakes right.



Therefore, we aim to ensure that:

- making a complaint is as easy as possible;
- we treat a complaint as a clear expression of dissatisfaction with our service which calls for an immediate response;
- we deal with it promptly, politely, and, when appropriate, confidentially;
- we respond in the right way - for example, with an explanation, or an apology where we have got things wrong, or information on any action taken, etc;
- we learn from complaints, use them to improve our service, and review annually our complaints policy and procedures.

We recognise that many concerns will be raised informally, and dealt with quickly. Our aims are to:

- deal with any complaint fairly;
- resolve informal concerns quickly;
- keep matters low-key;

An informal approach is appropriate when it can be achieved. But if concerns cannot be satisfactorily resolved informally, then the formal complaints procedure should be followed. All complaint responses, including an informal approach, must be handled by the Complaints Handling Team with Compliance Officer support. No individual member of staff should respond to a complaint.

Scope

This Policy sets out the way in which the Company will handle complaints received by it from existing or potential clients ("Clients") regarding the Company's provision of investment services and activities within the meaning of the Markets in Financial Instruments Directive (Directive 2014/65/EU) ("Investment Services").

This policy applies to all employees of the firm, its directors (including non-executive directors "NEDs") and all business functions. Where a function is outsourced, the firm still retains accountability for it being performed to appropriate standards. Any breach of this policy will be a serious matter, and may result in disciplinary action.



Policy Statement Complaints Handling Approach

A complaint is **any expression of dissatisfaction no matter how trivial**. The Company takes customer complaints very seriously and strives to:

- Investigate each complaint without delay, competently, diligently, and impartially;
- Assess each complaint fairly, consistently, and promptly with respect to the subject matter, whether it should be upheld and what remedial action or redress may be appropriate;
- Offer redress or remedial action when appropriate;
- Explain to the complainant promptly and, in a way that is fair, clear, and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress;
- Comply promptly with any offer of remedial action or redress accepted by the complainant; and examine all feedback overall, to ensure that where improvements in customer service may be made, those improvements are implemented;
- Advise complainants that they may be eligible to use the Financial Ombudsman Service.

The Company will endeavour to resolve all complaints within four weeks and to keep complainants periodically updated on the progress of their complaints. The Company as a directly authorised Firm, handles complaints in line with relevant regulatory requirements and the Financial Conduct Authority's ("FCA") DISP sourcebook in particular.

Complaints – General Principles

Any complaint received, no matter how trivial, must be immediately passed to the Complaints Handling Team copying the Compliance Officer.

The Company will deal promptly and fairly with complaints (as defined below) referred to it in respect of its business activities carried on from establishments in the UK.

The Company defines a complaint using the definition contained in the FCA glossary, namely:

Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination, which:

Alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and



Either: (i) to which article 26 of the MiFID Org Regulation applies; or (ii) which concerns the equivalent business of a third country investment Firm.

In order to review these complaints, the Company has in place and operates an appropriate and effective procedure for registering and responding to complaints from eligible complainants, as defined in the FCA's DISP rules. The company will review and respond to all complaints on a case-by-case basis where they are received from complainants who are not defined as eligible.

Financial Ombudsman Services and Alternative Dispute Resolution

Complainants will be informed that in certain circumstances they may be eligible to have their complaint reviewed or heard by the Financial Ombudsman Service (FOS). We will provide each complainant with a FOS guide and the contact details of the service. Note Professional and Eligible clients are generally not eligible for use of the service. We will also advise complainants that they may use an Alternative Dispute Resolution service (ADR).

Consumer Awareness

It is the Company's Policy to maintain systems and procedures which enable the Company to comply with the requirements of the Delegated Regulation and the FCA Handbook, in relation to the handling of complaints received from Clients regarding the Company's provision of Investment Services.

The Company understands that it is required to establish, implement, and maintain effective and transparent complaints management policies and procedures for the prompt handling of complaints from Clients of the Company regarding alleged wrongdoing, errors, or disruption in connection with the provision of Investment Services by the Company ("Complaints").

The Company will publish the details of the process to be followed when handling a complaint. Such details will include information about the complaints management policy and the contact details of the complaints management function. This information will be provided to clients or potential clients upon request or when acknowledging a complaint. The Company will provide information to eligible complainants, in a clear, comprehensive, and easily accessible way, about the Financial Ombudsman Service ("FOS"), including their website address.



Consumer Awareness

Complaints may be submitted by Clients to the Company without charge.

To ensure that Complaints are handled diligently, effectively, consistently, and in an independent manner, the Company has a Complaints Department as having responsibility for the investigation of Complaints.

All Complaints received by the Company, including those submitted verbally, must be reported without delay to the Complaints Department. The Complaints Department will inform the Compliance Officer of the details of each complaint. The Compliance Officer will decide if the complaint is so serious it should be immediately reviewed by the Board.

The Complaints Department will record details of any Complaint received and any response given by the Company in the Company's Complaints Log.

Upon receipt of a complaint, the Complaints Department will provide an acknowledgment of receipt to the Client, and issue a reference number, which will inform the Client about the Company's complaint's handling procedures.

The review and resolution of complaints

In order to reassure the Client that the Complaint is being appropriately reviewed and dealt with, an initial response to the Complaint will be provided to the Client in plain language that is easy to understand within five business days of receipt of the complaints handling form. As appropriate, the Client will be kept informed throughout the complaints handling process of any progress made in resolving their Complaint.

The Complaint will be investigated fully by the Complaints Department. Once the investigation is concluded, a full and clear explanation of the Company's position on the Complaint will be prepared in writing and provided to the Client without any undue delay. Such written explanation will also inform the Client about its options, including any alternative recourse mechanism (including the ability to take civil action) which may be available to it.

Who Can Make a Complaint?

There is no restriction on who can bring a Complaint, although a Complaint must be an Eligible Complaint in order to be capable of being handled in accordance with these procedures.



Eligible Complaints – are Complaints against the Company arising in connection with the fulfilment of its business activities.

A Complaint will not be an Eligible Complaint if it:

- Relates to the Company's relationship with its employees;
- Relates to the content of the Company's Terms of Business and/or is connected with a contractual or commercial dispute involving the Company;
- Is of a frivolous or vexatious nature or amounts to an abuse of process.

How Customers Can Make a Complaint

The Financial Conduct Authority has laid down clear procedures about how complaints should be handled (www.fca.org.uk/consumers/how-complain), and as a regulated firm we adhere to these proceedings in the fulfilment of our business activities.

Step One: Customer contacts the Company directly - Customer complaints can be received by any member of staff and all should be aware of the procedure for recording and escalating complaints. The following contacts are provided to customers, but these could just as easily be made to other individuals directly:

Complaints Department- LHCM Ltd
30 Churchill Place
London E14 5RE
Tel: +44 (0) 203 670 9945
Email: complaints@lhcm.uk

Details Required – In order to correctly record and investigate a complaint, the following details are required as a minimum:

- The client's entity name/name and surname;
- The client's trading account number;
- The affected transaction numbers, if applicable;
- The date and time that the issue arose;
- A description of the issue;
- Any documentation supporting the complaint;
- A contact number and email address where the Company can contact the client.



Complaint Time Limits

Upon receipt, each complaint will be handled by a central point-of-contact (“Complaint Handler”) who is not the subject of the complaint and will investigate and assess the case diligently, fairly, and promptly. The Complaint Handler will acknowledge receipt of the complaint by email. The reference should be shared with the client, so that emails can also be tracked, and the client must be provided with a copy of the ‘Complaint Handling Policy Statement’ from the Company’s website.

Customers must be kept informed and updated on the progress of their complaints and communications should be in accordance with the firm’s expectations for employee conduct. Once the investigation has been completed the Complaint Handler will send a final response with the findings and outcome to the client.

Most complaints should be solved quickly, but some may take longer and the Company aims to conclude these investigations in less than four weeks. It is possible that resolution may take longer than that, but a final response must be sent within 8 weeks of receiving a complaint.

Complaints Reporting

The Board will be advised through regular management reporting of all complaints received.

The Company will submit a bi-annual report to the FCA, containing details of each of the Complaints it has received during the relevant reporting period. The reporting periods are the six months immediately preceding and following the Company’s accounting reference date, and the report will be submitted no later than 30 days following the end of the relevant period. These details will include information about:

- the total number of Complaints received;
- the context in which those Complaints were submitted;
- the total number of Complaints closed or upheld; and
- the total amount of redress paid in response to those Complaints.

What if Customers are Still Dissatisfied?

Step One: The Complainant may appeal to the Firm. Where eligible a complainant may refer the complaint to the Financial Ombudsman Service or an ADR.

Step Two: Take legal action - If customers do not accept the decision of the Firm (or if eligible the Ombudsman service), they may be able to take their case to court as a last resort.



The Company may obtain professional advice as appropriate. In cases where the Complainants are not individuals the Company may offer alternative means of settling the dispute, such as arbitration or tribunal where appropriate; the options are stated in the Terms of Business.

Civil legal action normally starts in the county courts or High Court (in England, Wales and Northern Ireland), depending on the case. In Scotland, most small claims are started in the Sheriff Courts.

Monitoring and Review

This Policy is endorsed by the Company's Board.

Details of all Complaints received by the Company, including information regarding the nature and manner of resolution of each Complaint are recorded by the Compliance Officer in the Company's Complaints Log.

The Compliance Officer is responsible for maintaining records of the Complaints Log and any associated file(s) for 5 years from the date on which the Complaint is finally resolved.

The Compliance Officer periodically reviews the Complaints Log and the measures taken for the resolution of Complaints to identify and address any risks or issues with this Policy or the Company's compliance with it.

Related Documents

- Policies:
- Code of Conduct and Ethics
 - Complaints Handling Policy Statement

- Forms or other documents:
- Customer Feedback Log
 - Complaints Report Sheet



Review History

Version no.	Date of review	Reviewed by Changes made
1.0	01 AUG 2021	@jfa New policy finalized
1.1	01 AUG 2022	@jfa Updates made per external Compliance Consultant observations
1.2	20 JULY 2023	@alia The Policy was updated and finalized
1.3	28 FEB 2024	Alexsander Iakobachvili reviewed and updated