



Complaint Handling Procedure

AETOS Capital Group (UK) Limited

Dec 20, 2016

Compliance officer: Andrew M. Wood

V20161210



Complaint Handling Procedure

To comply with DISP Sourcebook from FCA, AETOS is responsible for ensuring professional and ethical standards within our staff and senior management on dealing with customer complaints, so as to be seen to be complying with the spirit of Treating Customer Fairly policy.

We are committed to providing an excellent service to our clients and strive to hold the highest personal and professional standards on dealing with complaints from eligible complainants.

An eligible complainant must be a person that is (DISP 2.7.3):

- 1) a consumer;
- 2) a micro-enterprise;
 - a) in relation to a complaint relating wholly or partly to payment services, either at the time of the conclusion of the payment service contract or at the time the complainant refers the complaint to the respondent; or
 - b) otherwise, at the time the complainant refers the complaint to the respondent;
- 3) a charity which has an annual income of less than £1 million at the time the complainant refers the complaint to the respondent; or
- 4) a trustee of a trust which has a net asset value of less than £1 million at the time the complainant refers the complaint to the respondent.

In the event of clients having any reason to feel dissatisfied with any aspect of our services, they should in the first place contact our customer service team by email, as majority of complaints will be dealt with promptly and fairly at this level.

Our contact details are:

Post:

AETOS Capital Group (UK) Ltd.
Level 6, One Canada Square
Canary Wharf
London
E14 5AA

Email: cs@aetoscg.uk

Telephone: 0208 104 9400



If customer services team is unable to resolve the matter, the complaints will be referred to our compliance officer who is independent from the matter complained of to ensure that we will act in our utmost to fulfil our obligations and treat clients fairly. To help us investigate and resolve their complaints as quickly as possible, we need to ask complainant to provide the following information on their email or telephone conversation:

- Name, address and user name
- A clear description of their concern or complaint
- Details of what complainant would expect from us
- Copies of any relevant correspondence, such as email, confirmation
- A daytime telephone number where we can contact them

1. Receiving complaints and initial response

We will contact complainant on receipt of a complaint. The staff member who is dealing with the case must send a prompt written acknowledgement providing early reassurance within 2 working days and also give the details of staff member's name that is in charge of this complaint; in addition, we must keep the complainant informed thereafter of the progress of the measures being taking for complaint's resolution.

2. Investigation

Once we received a complaint, it must be investigated competently, diligently and impartially, obtaining additional information as necessary. It must be assessed the subject matter of the complaint fairly, consistently and promptly to relate to one or more of the following:

- A breach of the Terms and Conditions
- A failure to comply with our responsibilities under the regulatory system
- Analysing the causes of individual complaints so as to identify root causes common to different types of complaint
- Bad faith, malpractice or impropriety

Senior management will try to ensure that the circumstances which led to the complaint being identified and rectified so that any acts or omissions leading to complaints are not repeated.

3. Final response

We must by the end of the 8th week after receipt of the complaint, send the complainant a final response, which either accepts the complaint, or if appropriate, offers redress or remedial action, or offers redress or remedial action without accepting the complaint, or rejects the complaint and gives reasons for doing so. In this case, we should enclose FOS contact information in our final response letter for complainant if they remain unsatisfied with our



response they may refer the complaint to the FOS within 6 months.

By virtue of any reasons we are not in the position to reach the decision in relation to the complaint, we still need to send out a written response within 8 weeks which explains the reason and indicates when we expect to be able to provide the final response, and complainant must be informed that they may now refer the complaint to FOS with the contact detail demonstrated on the letter.

4. Closing Complaints

Complaints are considered closed when we have sent a final response, or when the complainant has indicated, in writing, that he accepts an earlier response by us.

If we request further information and do not receive this, we will contact once more for this information. If it is not received following the chase up, the complaint will be closed. If we are able to respond to any of the complaint without the information we may attempt to do so, but we do not guarantee this as we may feel it is inappropriate to respond to only part of the complaint.

5. The Financial Ombudsman Service details are

AETOS is a member of the Financial Ombudsman Service an alternative dispute resolution scheme. The scheme has rules to who can complain to it regarding the products we provide. Should you require further information its details are:

The Financial Ombudsman Service South Quay Plaza
183 Marsh Wall London
E14 9SR

Email: complaint.info@financial-ombudsman.org.uk
Telephone number: 0800 023 4567 or 0300 123 9 123
Fax: 020 7964 1001
Website: www.financial-ombudsman.org.uk