

Lumyna Investments Limited (“Lumyna”) Complaints Handling Procedure

Lumyna is committed to providing a high level of customer service and welcomes feedback on the services we provide to our investors, respective advisors and counterparties. However, if you are dissatisfied with any service provided by us, Lumyna will seek to promptly resolve and respond to your complaint.

Lumyna has established, implemented and maintains complaints management policies and procedures aimed to facilitate the settlement of complaints quickly and fairly and to fulfil Lumyna’s obligations as set by Lumyna’s regulator, the Financial Conduct Authority. We aim to resolve your complaint within eight weeks of receipt. If we are unable to resolve your complaint within that timescale or you remain dissatisfied with our response, we will include information on your rights. Please see below for a summary of Lumyna’s Complaints Procedure.

1. What should you do if you wish to make a complaint?

If you have a complaint, you may make a notification to Lumyna either in writing or verbally (by phone or in person). Contact details are as follows:

Lumyna Investments Limited
11 Bressenden Place
London
SW1E 5BY

Telephone: +44 20 3997 0100.

Email: Complaints@lumyna.com

2. How will my complaint be handled?

We are committed to resolving customer concerns quickly and fairly. Your complaint will be dealt with by a Lumyna employee of appropriate seniority, who is independent of the matter. If we can resolve things immediately and to your satisfaction, we will send you a written response stating the resolution to your complaint called a ‘Summary Resolution Communication’ within 3 business days.

3. What happens if Lumyna is unable to resolve my complaint within three (3) working days?

If your concern is of a more complex nature and we need to investigate the matter further, it can take longer. Where this is the case, we will send you an acknowledgement letter within 5 working days. This letter will outline what happens next, the name and job title of the person handling the complaint and when you can expect to hear from us again.

We aim to provide a full and final written response within eight (8) weeks. If, after eight (8) weeks, we are still not in a position to resolve your complaint, we shall advise you in writing of the reason why the matter is still unresolved; when you may expect to receive a final response; and that you

may now refer the matter to the Financial Ombudsman Service (FOS).

4. What if I feel that my complaint has not been resolved satisfactorily?

If you are unhappy with our final response or at any stage of the process, we would like to know why and have the opportunity to put things right. Alternatively, you have the right to refer your complaint to the Financial Ombudsman Service (FOS). Such referral must occur within six (6) months of the date of Lumyna's written confirmation or to take civil action.

5. What is the FOS?

The FOS is a free and independent service set up by Parliament to resolve individual complaints between financial businesses and their customers when it is not possible to come to a mutual agreement. Only "eligible complainants" can have their complaints considered by the FOS.

The FOS will not consider a complaint before a final response has been provided or 8 weeks has elapsed since Lumyna received your complaint, unless Lumyna agree to this.

You can find out more about the FOS on their website: <http://www.financialombudsman.org.uk/>.

6. How do I contact the Financial Ombudsman Service?

Post: The Financial Ombudsman Service, Exchange Tower, London, E14 9SR

Email: complaint.info@financial-ombudsman.org.uk

Call: 0800 023 45687 (free for landlines and mobiles); 0300 123 9123 (calls cost no more than calls to 01 & 02 numbers); +44 20 7964 0500 (available from outside the UK – calls will be charged)

Website: www.financial-ombudsman.org.uk

7. What happens after my complaint is resolved?

We analyse each complaint received to record any errors that may have occurred. Our senior management team reviews this analysis on a regular basis to improve the level of service that we provide. We report all complaints received to the Financial Conduct Authority. This report is submitted twice a year.

8. What if I have questions about the complaints procedure?

Please contact us using the following details: Complaints@lumyna.com

We will do our utmost to ensure that your complaint is resolved to your satisfaction. If you have any further issues, please contact us again. If we have not heard from you 8 weeks after we have provided our final response, we will consider the complaint resolved.

Appendix I

Summary Resolution Communication (SRC)

If we are able to resolve the complaint within three business days of receiving it, we must send what's known as a summary resolution communication. This is a response to our customer which must:

Date of Complaint notification	
Name of Complainant and Contact details	
Summary of the complaint	
Say that you think the complaint has now been resolved	
Inform complainant they can refer their complaint to the ombudsman service (FOS) if they're not satisfied with the outcome.	
Indicate whether or not your business is happy to waive the relevant time limits (using the wording in DISP 1 Annex 3R).	<p>"You have the right to refer your complaint to the Financial Ombudsman Service, free of charge — but you must do so within six months of the date of this letter".</p> <p>"If you do not refer your complaint in time, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances."</p>
Provide the ombudsman's website address and explain that more information is available on our website	We don't have to explain whether Lumyna accepts or rejects the complaint or include a copy of the FOS leaflet.

Final Response

If Lumyna can't resolve the complaint within three business days, we will need to send a full written response to the customer's complaint. Our final response should:

Date of Complaint notification	
Name of Complainant and Contact details	
Summary of the complaint	

<p>Be open in acknowledging any mistakes made</p>	
<p>Give details of whether you accept the complaint and want to offer redress to settle the complaint, with a clear explanation of how you decided on that offer, or set out that you do not accept the complaint, with your reasons</p>	
<p>Tell the customer they have the right to complain to the ombudsman service within six months of the final response</p>	<p>“You have the right to refer your complaint to the Financial Ombudsman Service, free of charge — but you must do so within six months of the date of this letter”.</p>
<p>Indicate whether or not Lumyna is happy to waive the relevant time limits (using the wording in DISP 1 Annex 3R)</p>	
<p>Include the FOS contact details, a link to their website and a copy of their leaflet</p>	<p>It’s important to include all of this information in our final response letter. If your customer then refers their complaint to the FOS, they will normally use this letter as a starting point to look into the case.</p>