

COMPLAINTS' HANDLING PROCEDURE

As a valued client or potential client of Londinium DAC (“Londinium” or the “Company”), we are committed to providing a quality and professional service to you. Providing an efficient and courteous service is central to our ethos and we hope that as our client or potential client you experience this.

The purpose of this *Complaints' Handling Procedure* is to provide you with a guidance on the steps to follow if you are dissatisfied with the investment service we have provided to you. Please read it carefully to understand how to proceed, and please contact us immediately where you are not happy with the service you have received so that we can deal directly with the issue.

Please also note that *your suggestions* as to how we can improve our service so that it best meets your needs are always welcome. Such a dialogue is informative and useful for us as it helps us to respond to the needs of all of our clients or potential clients and to improve the investment service we deliver.

A *complaint* is an oral or written statement indicating any expression of grievance or dissatisfaction, whether justified or not, from or on behalf of a complainant about the Company's provision of, or failure to provide, a financial services activity.

You must submit your complaint *in writing*, to the attention of the Compliance Officer, either via post or via email, to the following address:

Londinium DAC
36 Upper Mount Street
Dublin 2
D02 Y982
Ireland

Email address: londiniumcompliance@londinium.ie

In addition, you can submit a written complaint to the Company through your Relationship Manager, who can assist you in this regard. You will not be charged when submitting a complaint to the Company.

Londinium will handle all complaints with due diligence, care and transparency, and it will acknowledge in writing receipt of your complaint within 5 business days of receiving it, enclosing a copy of this procedure and indicating the person handling it.

The complaint will then be fully investigated by the Company, which may involve speaking to the staff member who acted for you or requesting additional information from the custodian bank you have selected or any other counterparties the Company normally deals with in relation to the investment services it provides. Londinium undertakes to provide you with a final written feedback on the decision made, including explaining the reason for such decision, within 40 business days of receipt of the complaint, either via post or via email. While the investigation is still ongoing, Londinium will provide you with written updates on the *status* of your complaint at least every 20 business days.

Where you do not receive a response from the Company within the above-mentioned timeframe or where you are not satisfied with the Company's response, you are entitled to refer your complaint to the Financial Services and Pensions Ombudsman ("FSPO") at the following address:

Financial Services and Pensions Ombudsman

Lincoln House
Lincoln Place
Dublin 2
D02 VH29
Tel: (01) 567 7000

Email: info@fspoi.ie / website: www.fspoi.ie

All relevant data associated with your complaint will be logged in the *Complaint Register* kept by the Company at its premises, and the Register will be updated with the outcome of the investigation and the final response provided to you, including any action taken as a result of the complaint. The Complaints Register will be reviewed regularly as part of the Company's compliance monitoring programme checks.

In dealing with your complaint, Londinium will collect and process any personal information about you in compliance with the provisions of the *General Data Protection Regulation* (the "GDPR") and it undertakes at all times to protect your rights accordingly. For further information, please refer to the *Privacy Notice* statement, which is published on the Company's website.

The Compliance Officer will undertake an appropriate analysis of the pattern of complaints and report to the Board of Directors on an annual basis on the outcomes of the process and on any remedial actions taken, as well as to the Central Bank of Ireland where so requested.

Londinium reserves the right in its sole discretion to amend this *Complaints' Handling Procedure* at any time, and you should regularly check this website for any amendments.