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# Complaints Handling Process

## Introduction

Sucden Financial Hamburg GmbH (“SFH, “we”) are committed to providing the highest-quality service and fair treatment to our existing and potential customers. However, we recognise there may be instances where things go wrong, misunderstandings arise or you are not satisfied with the level of service or treatment you have received from us.

We have therefore, in accordance with Federal Financial Supervisory Authority (“BaFin”) rules, implemented a Complaints Handling Policy and Procedures. This document sets out the process that will be followed in responding to complaints for clients and potential clients.

## What is a complaint?

A “complaint” is defined as any expression of dissatisfaction from or on behalf of a client about SFH’s provision of, or failure to provide, a financial service.

A complaint does not need to be in writing and does not need to specifically reference that it is a complaint. However, while we provide periodic training and guidance to our staff enable them to identify and address complaints promptly and fairly we do recommend that, if you do wish to raise a complaint, that you provide:

- As much information as you can on the nature of and reason for your complaint.
- The relevant contact details for responding to your complaint.

All complaints are regularly evaluated by the complaints management team and checked to see whether organisational changes or personnel consequences are necessary. The Management Board is informed annually as part of the complaints management reporting about the customer complaints received, associated damages and organisational measures required to address any identified weaknesses.

The data protection requirements for complaint handling are taken into account and documented appropriately. In the case of complaints relating to data protection, the Compliance staff unit ensures that the SFH Data Protection Manager is informed of the facts of the case.

These principles are reviewed at regular intervals and compliance with them is evaluated as part of external audits. The supervisory authority is informed of any deficiencies.

The processing of any complaint is free of charge.

## Raising a complaint

You can raise a complaint by contacting your usual account executive or contact. Alternatively, you may wish to contact our complaints handling team using the contact details set out below.

### By post:

To: The Compliance Team, Sucden Financial Limited, 60 Great Tower Street, London, EC3R 5AZ

### By email:

To: [compliance@sucfin.com](mailto:compliance@sucfin.com)

**By telephone:**

Please contact using your normal business contact or on our office number of +44 (0) 20 3207 5000 and ask for the Compliance Team.

**Overview of our process for addressing complaints**

All complaints are taken very seriously and any feedback is appreciated as it provides us with an opportunity to improve our standards. In line with our commitment to you, as well as our legal and regulatory obligations, we shall endeavour to:

- Acknowledge and respond to your complaint without undue delay.
- Investigate and handle your complaint fairly and impartially.
- Communicate with you openly and clearly.
- Keep you informed about progress in resolving your complaints.
- Provide redress or carry out remedial action promptly where this is appropriate.
- Provide detailed and clear information as to our reasons for not upholding any complaint or not offering any redress or remedial actions.
- Provide details of alternative dispute resolution options that may be available to you.

You may have the right to make a complaint to a regulatory body and/or take civil action. We would, however, appreciate the chance to deal with your concerns before you approach any such regulatory body or take such action, so please contact us in the first instance.

While we will seek

**What you can expect from us in relation to any complaints**

In accordance with the internal rules, when responding to any complaint we will:

- Send you a written acknowledgment providing you with the contact details for the department handling your complaint within 3 business days following the day it was received.
- Seek to provide a final response as soon as possible and within 8 weeks from the date the complaint was received.
- Keep you updated on progress in resolving your complaint.
- If unable to provide a final response within 8 weeks, we will inform you in writing as soon as we know this will be the case. and

If we are able to reach a resolution with you within 3 business days from the day after the day the complaint was received we will not apply the above process and will send you a Summary Resolution Communication. This will make clear our conclusions in relation to the complaint and indicate whether you are able to refer your complaint to the Bafin. This communication will also make clear that you can request we start our formal Complaints Process as set out above.

**Referring your complaint elsewhere**

If we believe another firm is responsible for the complaint, we will forward it to them in writing and inform you we have done so. If we feel that the other firm is jointly responsible, we will inform you of the referral, provide the relevant contact details, and continue our investigation of the part of your complaint that comes under our remit.

**Reference to the possibility of out-of-court dispute resolution and civil action pursuant to Art. 26 para. 5 of the Delegated Regulation (EU) 2017/565.**

In the event of disputes with the SFH, it is possible to contact the Bafin:

[https://www.bafin.de/DE/Verbraucher/BeschwerdenStreitschlichtung/BeiBaFinbeschwerden/BeiBaFinbeschwerden\\_node.html](https://www.bafin.de/DE/Verbraucher/BeschwerdenStreitschlichtung/BeiBaFinbeschwerden/BeiBaFinbeschwerden_node.html)

While we will endeavor to reach a satisfactory conclusion with you, you also have the option of taking legal action.

**Publication**

A copy of the current Complaints Handling Process will be made available on the Sucden website and available on request.

This document was published with an effective date of 1 January 2025.