

Renaissance Capital

RENAISSANCE CAPITAL LIMITED

COMPLAINTS HANDLING POLICY

Effective 1 September 2020

1. Complaints Handling Policy - Introduction

This Complaints Handling Policy (the “Policy”) is intended to provide clients with information relating to the complaint handling arrangements that Renaissance Capital Limited (“RCL” or the “Company”) and, where relevant, the wider Renaissance Capital group of companies (“Renaissance Capital” or the “Firm”) have in place to comply with the requirements under the Markets in Financial Instruments Directive 2014/65/EU of 15 May 2014 (“MIFID II”) and Financial Conduct Authority (“FCA”) rules. References to Renaissance Capital or the Firm shall be construed as including RCL as well.

This Policy applies to all RCL staff.

2. Application

RCL endeavours to treat all complaints from all clients and potential clients fairly and promptly and in compliance with all applicable laws and regulatory requirements. In doing so, RCL will investigate all complaints competently, diligently and impartially.

The Company and Renaissance Capital consider that client complaints are crucial to the long-term business as:

- An efficient handling of such complaints ensures that regulatory and legal risk are substantially reduced;
- An efficient handling of client complaints supports the long-term competitive advantage of the business; client disputes, even where client claims are unfounded, bear a reputational and possibly an operational / business impact.

3. Handling of Complaints

3.1 What Constitutes a Complainant

Any client or potential client has the right to complain to the Firm.

A **complainant** is defined as any person, natural or legal, which is eligible for lodging a complaint with RCL and who has already lodged a complaint.

In addition, RCL must comply with certain additional regulatory requirements in relation to complaints made by **Eligible Complainants** related to investment services under the MiFID II.

An Eligible Complainant is:

- A natural person (i.e. an individual human being) acting outside his/her trade, business or other profession; or
- A micro-enterprise with fewer than 10 employees and having a turnover or balance sheet not exceeding €2 million; or
- A small business having an annual turnover of less than £6.5 million that either employs fewer than 50 people or has a balance sheet total of less than £5 million; or
- A charity with an annual income of less than £6.5 million; or

- The trustee of a trust with a net asset value of less than £5 million; or
- A guarantor, who is an individual who has given a guarantee or security in respect of an obligation or liability of a person who is a micro-enterprise or a small business; or
- In certain cases, a Politically Exposed Person (“PEP”).

All Eligible Complainants may be entitled to take their complaint to the **Financial Ombudsman Service (“FOS”)**¹.

3.2 What Constitutes a Complaint

A **complaint** is defined as any oral or written (whether received by letter, fax, e-mail, or other electronic means), expression of dissatisfaction, whether justified or not, from, or on behalf of, a client or potential client about the provision of, or failure to provide, a financial service, which alleges that the complainant has suffered (or may suffer) material financial loss, material distress or material inconvenience. Non-trivial complaints include complaints that involve allegations of a breach of law or regulation, negligence, serious breach of an obligation, a conflict of interest or a leak of confidential or price sensitive information.

3.3 How to Make a Complaint

All complaints can be raised by clients with their usual Renaissance Capital contact. If clients are not satisfied with the response of their usual RCL contact (or prefer not to raise the matter with that contact) they may raise the matter with the Compliance Department at ComplianceLondon@rencap.com.

3.4 How the Company Will Respond to a Complaint

As soon as possible and by no later than five business days following receipt of your complaint, we will provide you with a written “**Acknowledgement**” of your complaint.

This Acknowledgement will either:

- Respond to your complaint in full; or
- Indicate that we need further time to properly investigate your complaint and set out when we expect to provide you with a response.

In all cases, we will respond within eight weeks from the date we receive your complaint.

If we can resolve your complaint within three business days following receipt of your complaint, we will provide you with a written “**Complaint Resolution Summary**”. The Complaint Resolution Summary will acknowledge your complaint and will set out the findings of our full investigation of the matters giving rise to your complaint and our view of whether your complaint should be upheld or not and if so what remedial action and/or redress we feel is appropriate.

If we cannot resolve your complaint within three business days, we will provide you, within eight weeks of receiving your complaint, with either:

¹ Generally, financial services firms have up to eight weeks to respond to a complaint before the FOS will intervene, though in certain circumstances (e.g. where the firm and the client consent), the FOS may investigate sooner.

- a “**Final Response Letter**” – which will set out the findings of our full investigation of the matters giving rise to your complaint and our view of whether your complaint should be upheld or not and if so what remedial action and/or redress we feel is appropriate; or
- a “**Further Written Response**” which:
 - i. explains why we are not in a position to make a final response; and
 - ii. explains when we expect to provide you with a final response.

If you are an Eligible Complainant, when we send you a Complaint Resolution Summary, a Further Written Response or a Final Response Letter, we will also inform you that:

- if you subsequently decide that you are dissatisfied with the resolution of the complaint, you may now be able to refer the complaint to the FOS and must do so within 6 months; and
- further information about making a complaint to the FOS can be found on the website of the FOS at: www.financial-ombudsman.org.uk

3.5 Resolving a Complaint

A complaint is resolved when you indicate, either verbally or in writing, acceptance of our findings as set out in our Summary Resolution Communication or our Final Response Letter.

If we do not hear from you within eight weeks of the date of the Summary Resolution Communication or the Final Response Letter, we will consider your complaint closed.

If you are dissatisfied with the resolution of the complaint, you can use alternative channels to obtain redress:

- If you are an Eligible Complainant, you may have recourse to the FOS.
- All clients are entitled to start proceedings in a civil court.

3.6 Responsibility for Handling Complaints

The Company’s Compliance Department is responsible handling complaints. The Compliance Department maintains an Internal Complaints Register documenting the complaints received and actions taken. The Compliance Department is responsible for analysing complaints and complaints handling data to ensure issues are promptly identified and addressed.

RCL provides information on complaints and complaints-handling to the FCA on a semi-annual basis.

4. Review

The Policy will be reviewed at least annually, or as necessary to keep pace with any changes. The most recent version of this Policy will always be available on our website: <https://www.rencap.com/InvestmentBanking/LegalInformation/RenaissanceCapitalLtd/>

5. Further Information

Any queries about this Policy and its application should be directed to the Company’s Compliance Department at ComplianceLondon@rencap.com.