



The Davy Group Complaints Policy

11th October 2024

Purpose

At Davy (The Group), our purpose is simple, to deliver exceptional client outcomes. If we don't meet your expectations in any way, we want to have the opportunity to put things right. If something goes wrong, we will endeavor to solve the matter as quickly as possible. We shall do so in a manner that:

- Reflects the Group's objective to provide the highest possible level of service to our clients.
- Respects the right of clients to have any expression of dissatisfaction dealt with courteously, professionally and in a timely manner.
- Complies with the Group's regulatory and fiduciary obligations to our clients.

Making a complaint

If you are dissatisfied with the provision of a Davy product or service or the offer of same, or where Davy has failed and/or refused to provide a product or service to you, you are entitled to raise a complaint and request that an investigation be carried out.

Complaints can be submitted in person, by phone or in writing (by e-mail or letter) to your Davy relationship manager or Davy's designated complaints handling department, details of which are provided within this Policy. If an oral complaint is viewed as particularly complex or significantly detailed, we may ask you to put your complaint into writing. This procedure is in place to ensure that our interpretation of the complaint is correct, and accordingly, that a thorough investigation can be carried out.

Davy Group

Davy acknowledges that complaints must be investigated and dealt with in a manner that is consistent with regulatory requirements and guidance. Therefore, this Policy provides an overview of how complaints are addressed by the Group, depending on the relevant business unit.

Republic of Ireland

Complaints concerning products and services of a Davy Group ROI entity can be made directly to your client contact. Alternatively, you can refer your complaint in writing to J & E Davy Unlimited Company's Complaints Team at Davy House, 49 Dawson Street, Dublin 2, by email to complaints@davy.ie or by phone at +353 1 614 9036.

We may not be able to resolve the matters of a complaint immediately as some issues can be quite complex. If that is the case, Davy's Complaints Team will acknowledge receipt of your complaint in writing or by email within 5 business days of receipt and provide you with the name and contact details of the person investigating your complaint.

As part of the investigation, occasions may arise where we need to contact you to discuss the matters raised within your complaint. We aim to resolve matters as quickly as possible and whilst Davy's Complaints Team will attempt to investigate and respond to complaints within 20 business days of receiving a complaint, in some cases it may be necessary to extend this period.

If this occurs, you will be provided with a written update on the progress of your complaint on working day 20. It is our intention to resolve all complaints within 40 business days; however, in the event this is not possible, we shall write to you on working day 40 and inform you of our anticipated timeframe and of your entitlement to refer your complaint to the FSPO. Rest assured, we will keep you fully informed throughout the investigation of your complaint, and we will contact you every 20 business days until we have completed our investigation and written to you explaining the outcome.

If you are not satisfied with the outcome, we would encourage you to respond to us outlining any reasoning for same. We will endeavor to address any concerns. However, you are entitled to refer your concerns to the Financial Services and Pensions Ombudsman. Complaints may be referred to the Financial Services and Pensions Ombudsman at: Lincoln House, Lincoln Place, Dublin 2, D02 VH29, by email info@fspoi.ie or by phone: +353 1 567 7000. Further details are available on the FSPO's website: www.fspoi.ie.

(1) Where your complaint concerns any products or services provided by Davy Securities, you may refer your complaint to your client contact or to Davy's Complaints Team as outlined above however, in certain instances, the product or service complained of may fall within the jurisdiction of the US-based Financial Industry Regulatory Authority ("FINRA"). Where this occurs, FINRA will evaluate the complaint and may pass it to an appropriate regulator if it is not within FINRA's jurisdiction. Details relating to FINRA, including how to file a complaint, may be found on its website www.finra.org/investors/have-problem/file-complaint.

(2) Please note, complaints concerning J & E Davy's London office shall be answered in accordance with FCA guidelines.

United Kingdom

Complaints concerning a Davy UK entity are investigated by the Compliance Department of J & E Davy (UK) Limited (trading as Davy UK) in accordance with the Financial Conduct Authority's ("FCA") rules and guidance. In the event you are dissatisfied with a product or service provided by Davy UK, you may refer your complaint in writing to the Head of Davy UK, Donegall House, 7 Donegall Square North, Belfast BT1 5GB, who may, in turn, refer the matter to Davy UK's Compliance Department. Alternatively, you may email Davy UK at belfast@davy.ie or call +44 28 9031 0655.

In circumstances where your complaint is resolved to your satisfaction within 3 business days, you may receive a 'summary resolution letter'. If you are not satisfied with the findings contained within that letter, you may refer your complaint to the Financial Ombudsman Service ("FOS") or you may be able to take civil action. If Davy UK does not provide you with a summary resolution letter, or if your complaint is not resolved within 3 business days, Davy UK will formally acknowledge receipt of your complaint in writing or by email within 5 business days of receiving your complaint. While we shall investigate and respond to your complaint as soon as practicable, Davy UK will provide you with an update regarding the progress of its investigation within 4 weeks and you will receive a written response no later than 8 weeks from the date of filing your complaint. If you do not agree with the findings set out in our response, or where we have not provided you with a written response which addresses your complaint within 8 weeks, you may refer your complaint to the FOS. Alternatively, you may be able to take civil action. Details relating to the FOS, including how to make a complaint, are available at www.financial-ombudsman.org.uk. You may also send your concerns in writing to Financial Ombudsman Service, Exchange Tower, London E14 9SR or by email: complaint.info@financial-ombudsman.org.uk.

Appendix 1

Regulatory Requirements and Guidance

- Chapter 10 of the Consumer Protection Code 2012 (as amended) issued by the Central Bank of Ireland
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (recast)
- Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments and amending Regulation (EU) 648/2012
- Regulation (EU) 2016/1033 of the European Parliament and of the Council of 23 June 2016 amending Regulation (EU) 600/2014 and Directive (EU) 2016/1034 amending 2014/65/EU
- Joint Committee Final Report on guidelines for complaints-handling for the securities (ESMA) and banking (EBA) sectors updated May 2019
- The Financial Services and Pensions Ombudsman Act 2017 relevant to the establishment of the FSPO and the FSPO's procedures for financial service providers.
- The Financial Conduct Authority's ("FCA") Dispute Resolution: Complaints Sourcebook (DISP)
- Rules, standards and guidance material issued by the Financial Ombudsman Service ("FOS")
- Alternative Investment Fund Manager ("AIF") Rulebook March 2018 issued by the Central Bank of Ireland
- FINRA Rule 4513, Rule 4530(a)(1)(B) and the Securities Exchange Act, rule 17a-3 and FINRA Regulatory Notices 11-06,11- 21 and 13-08.
- The Law of 17 December 2010 on undertakings for collective investment (the "2010 Law") and the provisions of CSSF Regulation No. 10-4 and CSSF Regulation No.16-07 (replacing CSSF Regulation 13-02) and other valid regulations (e.g. CSSF Circular 18/698).

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