

## Complaints Policy

### Complaints Handling Policy

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1. Sigma (“we”, “us”, “our”, “ours”) operates and maintains the procedure set out below with the aim of dealing with complaints promptly, reasonably and fairly in a manner that satisfies the FCA’s complaints handling requirements. Any complaints relating to business carried out under these Terms are eligible for consideration under this policy.

#### WHAT IS A COMPLAINT?

2. For the purposes of these Terms, a complaint will be construed as any formal expression of dissatisfaction with regard to business carried out in pursuance of these Terms.

#### HOW SHOULD A COMPLAINT BE MADE?

3. Complaints in the first instance should be addressed to the Client Services department of Sigma. Should the complainant not receive a satisfactory response from the Client Services department, or the Client Services department believes the complaint to be of a nature or content that is best handled by the Compliance Department, the complaint should be referred to the Head of Compliance of Sigma. Complaints should be addressed to the Client Services or Compliance departments in writing by post or by email.

#### HOW WILL WE ACT ON A COMPLAINT?

4. Once a complaint has been received by us, we will:

- a. investigate the complaint competently, diligently and impartially;
- b. assess fairly, consistently and promptly:
  - i. the subject matter of the complaint;
  - ii. whether the complaint should be upheld;
  - iii. what remedial action or redress (or both) may be appropriate;
  - iv. if appropriate, whether it has reasonable grounds to be satisfied that another FCA regulated firm may be solely or jointly responsible for the matter alleged in the complaint;
- c. taking into account all relevant factors:
  - i. offer redress or remedial action when it decides this is appropriate;
  - ii. explain to the complainant promptly and, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress; and
  - iii. comply promptly with any offer of remedial action or redress accepted by the complainant.

5. Factors that may be relevant in the assessment of a complaint might include the following:

- a. all the evidence available and the particular circumstances of the complaint;
- b. similarities with other complaints received by us;
- c. relevant guidance published by the FCA, other relevant regulators, and the Financial Ombudsman Service; and
- d. appropriate analysis of decisions by the Financial Ombudsman Service concerning similar complaints.

6. We aim to resolve complaints at the earliest possible opportunity, minimising the number of unresolved complaints that may later be referred to the Financial Ombudsman Service, where applicable.

## TIME LIMITS FOR DEALING WITH COMPLAINTS

7. Where possible, and assuming the nature of the complaint facilities this, we will aim to resolve complaints within 5 business days. The criteria noted above under “How will we act on a Complaint?” will be applied in this regard. A complaint will be regarded as closed once the complainant has indicated acceptance of or response. Such acceptance need not be in writing, although where this is the case we will make a written record of the Complainant’s acceptance.
8. Should it not be possible to conclude a complaint within 5 business days, we will:
  - a. promptly acknowledge the complaint in writing and advise that it is investigating the issue; and
  - b. keep the Complainant apprised of progress of the investigation as appropriate.
9. We will investigate complaints in accordance with the criteria noted above (“How will we act on a complaint?”) and issue a final response to the Complainant within 8 weeks of the date of receipt of the complaint. The final response should:
  - a. offer redress or remedial action if appropriate, or reject the complaint explaining the reasons why;
  - b. advise the Complainant that if we do not receive a response to the complaint within 8 weeks it will consider the complaint closed
  - c. where applicable, refer the complainant to the availability of the Financial Ombudsman Service should they remain unhappy with our final response, and note that referrals must be made within 6 months of receipt of the final response.
10. Should we be unable to respond to a complainant within 8 weeks for any reason, we will write to the Complainant and advise:
  - a. why we are unable to provide a final response and when it anticipates being able to issue one;
  - b. the Complainant of their right to refer the complaint to the Financial Ombudsman Service (as part of this a copy of the Financial Ombudsman Service standard explanatory leaflet will be supplied).