Complaint Policy

Our commitment to you

As an Investor who has chosen to invest (or is considering investing) through Novia Global, we value the relationship with you and we believe you have the right to a fair, swift and courteous service at all times.

We aim to provide Investors with the highest standards relating to the provision of our investment service at all times. However, sometimes things can go wrong and when this happens we encourage Investors to tell us about it, so we can investigate the matter and put things right where necessary.

Relevant to providing a first-class service we investigate any complaint about the service we provide as required by the Financial Conduct Authority (FCA) rules in relation to an investment firm.

Our policy and complaints procedure have been established so that Investors can be confident that a complaint can be easily brought to our attention and to provide assurance that Novia Global will fully investigate the complaint, act promptly and be transparent in our complaint communications.

How to complain

You can contact our Client services team or the Compliance Manager at the following address:

Novia Global Ltd
22 St Lawrence St
Southgate
Bath
BA1 1AN

Email: cllientservices@novia-global.com

Telephone: +44 (0) 1225 517 517

Telephones calls are recorded for training and monitoring purposes and to meet regulatory requirements for financial services.

Our approach

We aim to resolve complaints promptly. Many complaints can be fairly resolved in this way because it is our policy to put Investors back into the position that they should have been had Novia Global processed the instruction correctly. Such prompt resolutions are best handled and resolved by our client services team.

Occasionally the complaint may require more time to investigate, possibly because any proposed prompt resolution is not accepted by the Investor, due to the circumstances being more complicated, due to delays in bringing the complaint to our attention, the involvement of other parties or the potential values involved. Such complaints are investigated by the compliance team whom are independent of staff carrying out the administration of Investor accounts.

Our process

We listen to the concerns raised by the Investor, or someone acting on their behalf. We will acknowledge the complaint. If the complaint has been made by telephone we will summarise the points of the complaint which provides the opportunity to clarify any misunderstanding we may have made.

We gather information from our records which may include, amongst all the information available to us, listening to recordings of phone conversations, reviewing documentation received and details of instructions submitted to Novia Global. We may request further information from the Investor or their Adviser. We may need to engage with third parties that were involved in the transaction.

Our aim is to objectively and fairly assess whether anything has gone wrong and who is or should be responsible. We explain our findings in a final response letter that is sent to the Investor or the person complaining on their behalf. If we are unable to send a final response letter within 8 weeks we will write to you to explain the current position. We aim to issue final responses much quicker than this and we will inform you of progress if it is taking longer than expected.

If we have accepted responsibility for the cause we will propose how we will resolve it. We intend to explain our findings and proposals in plain English to make it easy to understand. We are willing to provide any further clarification if this assists Investors. It is our policy to ensure that all outcomes are fair and easy to understand.

Investors' rights

Novia Global hopes to resolve all complaints in a prompt and fair way. Even if Novia Global does not accept the complaint against us we will explain why in our final response letter. Investors* have the right to refer complaints

to the Financial Ombudsman Service if either Novia Global has taken too long to respond to a complaint or the Investor does not accept the outcome that we have explained.

The Financial Ombudsman service is free of charge and may be contacted at:

Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Tel: 0300 123 9123

Email: complaint.info@financial-ombudsman.org.uk

www.financial-ombudsman.org.uk/

You must refer your complaint to the Financial Ombudsman within six months of the date on the Novia Global final response letter.

You are also able to refer your complaint online to the Online Dispute Resolution (ODR) platform, which is an Alternative Dispute Resolution (ADR) process, setup by the European Commission. They will use the Financial Ombudsman Service with the aim of resolving your dispute. The link to the ODR platform website is: http://ec.europa.eu/odr

If you have a complaint or dispute concerning your workplace or personal pension arrangements you should contact:

The Pensions Ombudsman
Telephone: 0800 917 4487
Website: www.pensions-ombudsman.org.uk

If you have general requests for information or guidance concerning your pension arrangements contact:

The Pensions Advisory Service
Telephone: 0800 011 3797
Website: www.pensionsadvisoryservice.org.uk/

You also have the right to take civil action.

Our complaint procedure

1. We will acknowledge your complaint properly

2. We will conduct a thorough investigation into the subject of your complaint. While we endeavour to resolve all complaints as swiftly as we can, please understand that some investigations take longer than others depending on factors such as the complexity of the complaint and the need to contact third parties.

3. We will endeavour to send a final response to you within 8 weeks of receipt of your complaint. If we are unable to provide you with a final response within this time frame, we will write to you explaining why and advise you when you can expect a final response.

4. If more than 8 weeks from the date of your complaint has passed and you haven't received a final response from us, or you are dissatisfied with the final response you have received (at any stage of the process), you can write to the Financial Ombudsman Service (see above contact details)

   The Financial Ombudsman service is free of charge.

   You must refer your complaint to the Financial Ombudsman within 6 months of the date on the Novia Global final response letter

More information

More information is available from our Client Services team. Please see '**How to complain**' (above) for their contact details.

*Eligible complainants and Eligible counterparties only as defined by the FCA which includes individual consumers, many small businesses and trusts.