

# Complaints Handling Process

## Introduction

Marex Financial (“MF”) and Marex Spectron International Limited (“MSIL”) are regulated by the Financial Conduct Authority (FCA) with Reference Number 442767 and 193027 respectively. In line with the regulations, MF and MSIL (“we”, “us”, “our”) are required to have in place effective and transparent complaints management policies and procedures for the prompt handling of clients’ or potential clients’ complaints.

We committed to uphold the highest standards to the expectation of our clients. However, we are aware that our clients may be dissatisfied with a product or service rendered by either MF or MSIL.

## What is a complaint?

A complaint is any oral or written expression of dissatisfaction from, or on behalf of, a person, where the complainant alleges he/she has suffered (or may suffer) financial loss, material distress or material inconvenience.

A complaint received by any staff within MF/MSIL must immediately be forwarded to the Compliance Department who will appoint an officer to investigate and respond to the complainant.

## How to submit a complaint?

A formal complaint should be submitted **in writing** through the following channels:

Email us at [London-Complaints@marex.com](mailto:London-Complaints@marex.com)

Write to us by post:  
Marex Financial  
Level 5  
155 Bishopsgate  
London EC2M 3TQ  
United Kingdom  
Attn: Compliance Complaints

Alternatively, you can raise an expression of dissatisfaction or feedback directly with your MF/MSIL business contacts through other means (e.g. telephone call, face-to-face, etc.).

### What is the timeline for acknowledging a complaint?

A written acknowledgement will be sent to the complainant via mail or email within 5 business days of the receipt of the complaint unless the complaint can be resolved by the close of business on the next business day.

### How is a complaint investigated, assessed and resolved?

We will review what has happened. Mostly complaints can be resolved promptly; however, some may be more complex and may require more time to determine the outcome. We will allocate a complaint handler who will investigate your complaint competently, diligently and impartially by obtaining all relevant information as necessary. The complaint handler may need to contact you for additional information while investigating your complaint.

Once the complaint handler completes their investigations, they will summarise their investigations including whether your complaint is upheld (fully or partially) and any remedial action and/or redress (if upheld). If the complaint handler decides that your complaint is not upheld, an explanation will be provided.

### What is the timeline for responding to complainants?

If we are able to resolve your complaint by the close of business on the third business day following the day on which the complaint was received, we will send you a written summary resolution communication and inform you that your complaint has been resolved and if you are still dissatisfied, you may be able to refer your complaint to the Financial Ombudsman Service.

If we are unable to resolve your complaint within three business days following the day your complaint was received, we will keep you informed of the progress of the measures being taken. We aim to resolve your complaint as soon as practical and send you our final response letter or email accordingly. If for any reason we are unable to resolve your complaint by the end of eight weeks after the receipt of the complaint, we will send you a written explanation and inform you that you may be able to take your complaint to the Financial Ombudsman Service if you no longer want to wait for us to complete our investigation.

### Financial Ombudsman Service ("FOS")

The FOS is a free and independent service that settles complaints between consumers and businesses that provide financial services. If we are unable to resolve your complaint within eight weeks or you are not satisfied with our resolution of your complaint, you may refer your complaint to the Financial Ombudsman Service which will review your complaint independently and impartially. For more information about the Financial Ombudsman Service, please visit [www.financialombudsman.org.uk](http://www.financialombudsman.org.uk).

Only complaints raised by or on behalf of eligible complainants or MiFID complaints may be dealt with under the Financial Ombudsman Service. The FOS will only look into your complaint if:

- You have received a summary resolution communication from us and you are still dissatisfied with our resolution; or
- You have received a final response letter or email from us and you are still dissatisfied with our resolution; or
- It has been more than eight weeks since we received your complaint.

Alternatively, their contact details are:

Financial Ombudsman Service  
Harbour Exchange Square  
London E14 9SR

Website: [www.financialombudsman.org.uk](http://www.financialombudsman.org.uk)

Freephone: 0800 023 4567 (or +44 207 964 0500 from abroad)

Email: [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)

The FOS may not be able to look into your complaint if:

- They do not receive your complaint within six months from the date of our summary resolution communication or final response letter/email.
- What you are complaining about happened more than six years ago and you are complaining more than three years after you realised (or should have realised) that there was a problem.
- The FOS believes that your complaints falls outside their jurisdiction.

### Governance and Management Reporting

- All complaints will be centrally stored and reported to Senior management via the respective governing Committees
- Complaints and their origin will be reviewed on an annual basis to assess whether any pattern can be identified and therefore a corrective action needs to be taken
- Any proposed actions will be reported to the respective Committees for review and approval

## Appendix

### Are you an eligible complainant?

A complaint may only be dealt with under the Financial Ombudsman Service if it is raised by or on behalf of an eligible complainant regardless whether the person authorized to act on behalf of an eligible complainant is himself an eligible complainant.

As defined under DISP 2.7.3R, an eligible complainant must be a person (legal or natural) who is also one of the following:

- a consumer (i.e. any natural person acting for purposes outside trade, business or profession); or
- a micro enterprise (i.e. an enterprise which employs fewer than 10 persons and has a turnover or annual balance sheet that does not exceed €2 million);
- a charity which has an annual income of less than £ 6.5 million at the time the complainant refers the complaint to the respondent;
- a trustee of a trust which has a net asset value of less than £5 million at the time the complainant refers the complaint to the respondent; or
- a CBTL consumer (i.e. a person acting for purposes outside trade, business or profession or a borrower under a CBTL credit agreement); or
- a small business at the time the complainant refers the complaint to the respondent; or
- a guarantor.

DISP 2.7.9R also provides that other than a trustee of a pension scheme trust, a professional client or an eligible counterparty is not an eligible complainant.

For non-MiFID business, clients or potential clients of MF/MSIL are either professional clients or eligible counterparties and therefore are unlikely to be eligible complainants.

### Is it a MiFID complaint?

As defined under DISP 1.1A.3, a MiFID complaint is, amongst other things, a complaint to which Article 26 of the MiFID Org Regulation applies, being a complaint about the provision of investment services or ancillary services to a client by either MF or MSIL.

Only certain provisions of DISP 1.1A are applicable to MiFID complaints received from our professional clients and eligible counterparties that are not eligible complainants.