

COMPLAINTS POLICY

INTRODUCTION

SIGNET maintains an adequate procedure for handling complaints and grievances in accordance with ESMA guidelines and keeps records of every complaint or grievance including all measures taken for their resolution.

SIGNET considers as a complaint any written statement expressing dissatisfaction with services provided, based on actual or supposed circumstances that have caused hardship or harm to its originator.

SUBMISSION OF COMPLAINTS

SIGNET considers all complaints where the Complainant has submitted a written statement of dissatisfaction addressed to Signet by email (complaints@signetglobal.com) or through SIGNET's website.

COMPLAINTS REGISTER

Complaints received from Clients/Investors are registered in SIGNET's complaints register, which is managed and controlled by the Compliance department. A unique reference number is assigned to each individual complaint and is used in all future contact with SIGNET and/or the Financial Ombudsman.

ACKNOWLEDGEMENT OF COMPLAINTS

The Compliance department will send the Complainant a written acknowledgment by email confirming receipt of the complaint as soon as possible and not later than five (5) business days after receipt of the initial complaint, attaching information regarding SIGNET's complaint handling procedure.

Investigation of the complaint is subject to provision of correct information by the Complainant. Therefore, the following information should be provided:

- a) Complainant's full name;
- b) The service or department to which the complaint refers;
- c) Details of the employee responsible for services rendered;
- d) Complainant's managed account number;
- e) The date and a brief description of the case;
- f) Identification details of the Complainant;
- g) The content of the complaint;
- h) Capital and value of the Complainant's financial instruments;
- i) Magnitude of the damage which the Complainant claims to have suffered; and
- j) References of any correspondence exchanged between Signet and the Complainant.

EXPECTED TIMELINE

If the Complaint requires further investigation and SIGNET is unable to resolve it within two (2) calendar months, SIGNET will provide the Complainant with a written response indicating the reasons for the

delay and the approximate time of finalization. In this case, SIGNET will provide the Complainant with the outcome of the investigation not later than one (1) month after sending the initial written response.

SUBMISSION OF COMPLAINTS TO THE FINANCIAL OMBUDSMAN

From time to time, SIGNET may reach a final decision in any given complaint that does not fully satisfy the Complainant's demands. In these cases, the Complainant will be notified in writing and will be provided with a thorough explanation of SIGNET's position on the complaint. This notification to the Complainant will be marked clearly as the Final Response and SIGNET will also include details on how the Complainant may further file the complaint with other relevant mechanisms such as the Financial Ombudsman.

The Financial Ombudsman is an independent organization established to resolve disputes between financial institutions and their Clients/Investors. The Financial Ombudsman will not consider a complaint until SIGNET has had the opportunity to investigate and find a solution. A Complainant must contact the Financial Ombudsman, within a period of four (4) calendar months from the date of receiving a Final Response from SIGNET otherwise the Financial Ombudsman may not be able to deal with the complaint.

In the unlikely event that SIGNET is unable to provide the Complainant with a final response within the three (3) month period specified above, the Complainant may contact the Financial Ombudsman no later than four (4) months after the date when SIGNET ought to have provided the Complainant with the Final Response.

Contact details of Financial Ombudsman can be provided upon request.

Complainants may also contact the local regulator and report their complaints. However, it should be noted that local regulators do not have restitution powers and consequently are unable to investigate individual complaints.

Please note that your right to take legal action remains unaffected by the existence or use of SIGNET's procedures for handling complaints and grievances.

RECORD KEEPING

SIGNET shall maintain a record of all complaints and related details for a period of five (5) years, or seven (7) years, if requested, in accordance with the applicable legislation.

Important Note: Private information is not shared with any third parties and SIGNET complies with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as 'GDPR').

MONITORING AND REVIEW

SIGNET shall perform a periodical review of this policy, at least on an annual basis. The policy is in line with SIGNET's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this policy.