



Complaints Policy

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1. Introduction

The AMF requires firms to have a Complaints Policy in place to ensure clients and prospective client's complaints are handled in line with AMF rules and guidance. A complaint is a written expression of dissatisfaction, whether justified or not, from, or on behalf of, a client or prospective client in relation to the provision of, or failure to provide, a financial service.

2. Purpose

The purpose of RJOF's Complaints Policy is to:

- Ensure that clients are treated fairly;
- Complaints are handled promptly.

3. Scope and applicability

3.1 Who?

This Policy applies to clients or prospective clients of RJOF.

3.2 What?

This Policy applies to all RJOF activity that:

- (a) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- (b) relates to any activity that RJOF, has some connection in marketing or providing financial services or products.

This Policy applies to any existing or potential client complaint received in relation to the provision of RJOF services.

3.3 Definition of eligible complainants

All the RJOF clients are eligible complainants. We remember that the Financial Ombudsman Service offered by AMF applies only to individuals ("consumers") et does not apply to disputes between professionals. All the RJOF Clients are professional or eligible counterparties and thus not eligible to the service offered by AMF.

4. Responsibilities

The Compliance department is responsible for:

- day-to-day implementation of this Policy;
- dealing with any complaints received by RJOF;
- monitoring the Policy's use and effectiveness; and
- escalating concerns or issues to Senior Management.

5. How to submit a Complaint

Complaints must be submitted to RJOF in writing either via email or postal letter to Compliance who will acknowledge receipt of the complaint within 5 business days.

Contact details for Compliance are:

RJOFCompliance@rjobrien.com

**7 rue de Magdebourg
75016 PARIS**

6. Complaints handling timeframe

6.1 Receiving complaints

On receipt of a complaint, RJOF must:

- (1) send the complainant a prompt written acknowledgement (within 10 business days) providing early reassurance that it has received the complaint and is reviewing it; and
- (2) ensure the complainant is kept informed thereafter of the progress of the measures being taken for the complaint's resolution, as appropriate.

6.2 Reviewing and investigating complaints

RJOF Compliance is in charge of complaint oversight. The operational, business and any other relevant teams provide factual or technical input for the response as needed.

Responses are reviewed and approved by Compliance prior to issuance. Written replies are clear, fair, and based on an objective investigation.

6.3 Responding to complaints

A final or other response must be sent to the complainant within eight weeks of the initial receipt of the complaint, unless justified by specific complexity; in such cases, the client is informed of the delay and the reasons for it.

A 'final response', is a written response from RJOF which may either:

- (a) accepts the complaint and, where appropriate, offers redress or remedial action;
or
- (b) offers redress or remedial action without accepting the complaint; or
- (c) rejects the complaint and gives reasons for doing so.

7 Monitoring and Review

The Compliance Department maintains logs of:

- all complaints received from clients;

- all responses sent to clients;
- all escalations sent to the Legal department in case of client litigation and the Group responses.

Complaints are monitored by compliance as part of the Level 2 permanent control plan.

All complaints are recorded in RJOF Complaints Register, held by Compliance including:

- Client identity
- Date received
- Nature of the complaint
- Business line concerned
- Status and resolution date

This Policy will be reviewed on a regular basis.

8 Reporting

Annually RJOF completes and submits its RCSI questionnaire to the AMF via ROSA platform which includes question about the complaints received.

In addition, statistics and relevant information about complaints are provided to the Audit and Risk Committee (ARC) on a semi-annual basis. Any key risk identified through a complaint must be escalated without delay by RJOF Compliance to Global management and/or ARC.

9 Record retention

RJOF is required for regulatory purposes to retain all records relating to Complaints for a minimum period of five years from the date that RJOF has provided a final answer.