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## **COMPLAINTS HANDLING POLICY**

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**TP ICAP Europe SA (TPIE)**

**OCTOBER 3, 2023**



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## **1. Introduction**

### **1.1 Definitions:**

**Client** : includes existing and prospective clients.

**Staff**: are defined as staff of TPIE directors, employees, agents related to TPIE any person directly or indirectly related to TPIE by control, as well as any person under the authority of TPIE or acting on its behalf.

**TP ICAP**: means TP ICAP Group and its subsidiaries.

**Group**: Refers to the TPICAP group.

**TPIE**: TP ICAP Europe SA.

### **1.2 Description:**

This complaints handling policy describes the measures implemented by TPIE to identify, manage and record clients complaints.

The policy has been drafted in accordance with the Directive 2014/65/EU on markets in financial instruments (Article 16(2)) and the Delegated Regulation 2017/565 (Article 26).

### **1.3 Complaints definition:**

A complaint is a statement of the client dissatisfaction with the professional, complaint can be made by letter, phone call or e-mail.

A complaint may relate to any financial instrument, any investment service and, more generally, any matter falling under the scope of the Autorité des Marchés Financiers.

### **1.4 Scope of application:**

This policy applies to TP ICAP Europe SA (TPIE), its branches and all of its employees.

## **2. Roles & Responsibilities:**

The Compliance Department is responsible for managing complaints and monitoring of the complaints handling process : registration, investigation, information given to clients, respect of response deadlines, clients satisfaction with the follow-up given to the complaint.

The Head of Compliance in Continental Europe is the senior manager in charge of complaints handling for TPIE.

## **3. Information and access to the complaints handling system:**

The Compliance Department at TPIE ensures that all complaints are dealt with and satisfactorily responded to in a timely manner.

The complaints handling process includes the provision of :

- Free and accessible information on process and timeline of complaints handling, the contact details of the dedicated department in charge of handling complaints, and details of the mediator who may be competent if the client considers the complaint not satisfactorily resolved.



- Handling the client requests for information on the progress of complaint processing

## **4. Complaints Handling:**

### **4.1 Organisation**

TPIE organisation enables client to submit complaint to the usual contact person. If the client considers the complaint not satisfactorily resolved he can contact TPIE's Compliance Department, the body in charge of complaints handling:

[paris-compliance@tpicap.com](mailto:paris-compliance@tpicap.com)

TP ICAP (Europe) SA  
Service Conformité  
42 rue Washington  
75008 Paris  
France

### **4.2 Processing time**

- A maximum of ten working days to acknowledge the receipt of the complaint,
- A maximum of two months, from the date of receipt of the complaint to address a response to the client, except special justified circumstances.

### **4.3 Requirements for staff:**

All staff are trained to clearly identify complaints received and to use the complaints handling process appropriately.

Staff who receive a formal verbal or written complaint from a client or former client must immediately notify their line manager and the Compliance Department.

Staff who receive a complaint must record the following details and to add them in their notification to line manager and to the Compliance Department:

- ✓ the name and contact details of the complainant;
- ✓ a description of the order, operation or service concerned/planned or the difficulty giving rise to the complaint;
- ✓ the nature of the complaint with as many details as possible;
- ✓ the exact time and date of the complaint.

A complaint handling procedure is available to all staff.

### **4.4 Complaints register**

TPIE approach to manage complaints is based on the maintenance of a register of all complaints raised, which include the details of the complaint, the date of receipt, and the actions taken to respond to the complaint.

TPIE's Compliance Department is responsible for the maintaining of the register and the monitoring of the complaints.



## **5. Mediation and dispute resolution**

If the client considers the complaint not satisfactorily resolved he can contact the Mediation Service of the AMF (l'Autorité des Marchés Financiers), free of charge, by letter : 17 place de la Bourse 75082 Paris cedex 2, or by electronic form available on the AMF website :

<https://www.amf-france.org/en/amf/amf-regulation/mediation-service>

## **6. Control & Follow-up of the processing of complaints**

### **6.1 Control**

Complaints are investigated in order to identify the issues and to set up the appropriate actions and controls.

### **6.2 Internal Reporting:**

The Compliance Department of TPIE is in charge of following-up complaints until they are resolved, and ensures the restitution of actions taken to the departments and staff concerned. The Compliance report the difficulty giving rise to the complaint and the identified issues in the RCCC (Risk, Control & Conduct Committee).

### **6.3 Reporting to regulators:**

The issues identified as well as the results of the control carried out on the information provided to client, the organization and complaints handling process are detailed in the annual report on compliance and internal control.