

Hirose Financial UK Ltd. Complaints Handling Summary Policy

We are committed to providing a high standard of service to our clients on every occasion. We do recognize however, that occasionally there may be circumstances where you are dissatisfied with the service that you receive from us and wish to raise a complaint. Normally, complaints arise from misunderstandings and most can be resolved quickly and easily. In the unlikely event when you wish to issue a complaint to us, please contact our Complaints Management Function.

1. Purpose

This Complaints Handling Summary Policy will detail how the Firm will deal with MiFID complaints. The Firm is authorized by the Financial Conduct Authority (FCA) and it will adhere strictly to the rules and regulations defined in the FCA Handbook.

2. Review of Policy and Procedures

This policy and procedure will be reviewed once a year, plus, anytime when there is an update at FCA or when considered necessary by the management.

3. Responsibilities of concerning parties

Management- Implementation and monitoring of the policy.

Compliance- Analyzing the complaints and addressing risks and issues.

Employees- Report any complaints, both verbal and written, to the Complaints Management function in a timely manner and give sincere support in its investigation.

4. MiFID Complaints, Disputes and Compensation

4.1. Definition of MiFID Complaint

A MiFID complaint is a complaint on:

Investment firm's provision of investment services or ancillary services to a client.

CRD Credit institution's provision of single or multiple investment services to a client.

Investment firm or CRD Credit Institution's marketing and sales of structured deposits.

Investment firm's collective portfolio management permitted by UCITS Article 6-3.

Investment firm's collective portfolio management permitted by AIFMD Article 6-4.

In addition, MiFID complaint is a complaint about equivalent business of a third country investment firm.

4.2. Definition of a complainant

Retail client

Professional client and elective professional client

Eligible counterparty

4.3. Definition of eligible complainant

- A consumer
- A micro enterprise
- A charity (income below GBP 1,000,000)
- A trustee of trust (net asset value below GBP 1,000,000)

If professional clients or eligible counterparties are acting outside of their professions to which the complaint relates, then, they will be considered as consumers and so they are eligible complainants.

When whether a complainant is an eligible complainant or not is ambiguous, the Firm treat them as an eligible complainant. As per DISP 2.7.6 (2), complaint handling applies to both clients and potential clients.

Only eligible complainants can proceed to addressing their complaints to the Financial Ombudsman Service.

5. Policy

The Complaints Procedures is available on request to both clients and potential clients. Contact details of the Complaint Management Function is mentioned there. Clients and potential clients may submit their complaints free of any charges. Having received the complaints, the Firm shall assess the matter fairly, consistently and promptly communicate with that customer in a way that the customer can understand.

The points to be assessed are:

- The subject matter of the complaint.
- Gather all evidences and check circumstances of complaints.
- Whether similar to other complaints received previously.

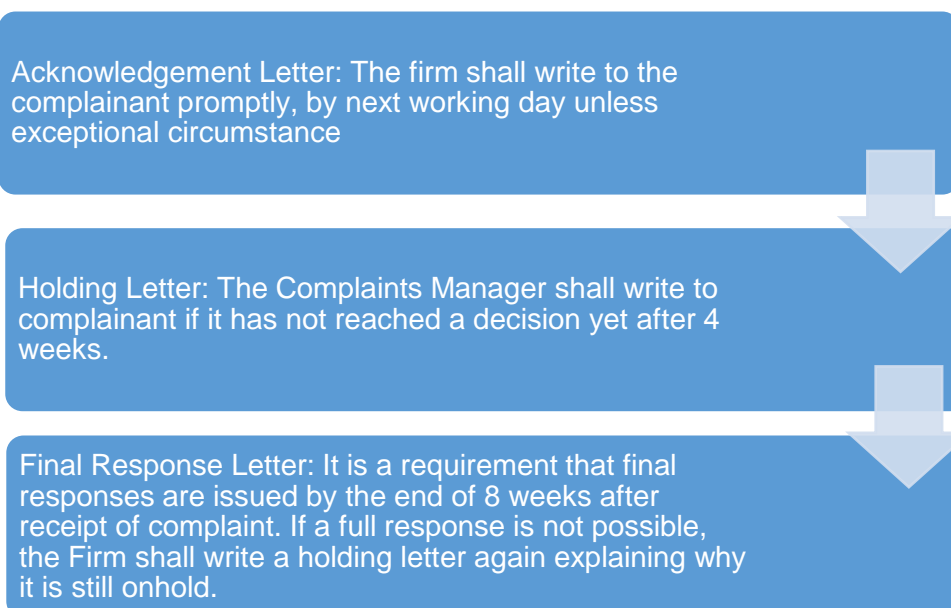
- Whether the complaint should be upheld or not.
- Check within guidance published by FCA, other relevant regulator or Financial Ombudsman.
- If there is any other party that is involved in the case and to what extent the party may be responsible for the complaint.
- Corrective measures and counter measures.

The Firm shall proceed to any offer or corrective measures accepted by the complainant. A complaint shall be closed once the Firm issues final response letter. The firm will provide contact information on Financial Ombudsman. Should a complaint reach the Financial Ombudsman, the Firm shall give full cooperation to them and comply with any settlement option made by them.

6. Timeline

6.1. Time limit

Upon receipt of complaint, the Firm will write to the complainant to confirm acknowledgement of its receipt. The Firm must ensure the complainant is kept informed of the progress and the Firm will write to the complainant after 4 weeks if it has not reached a decision yet. Final response to the complainant must be made to the complainant within 8 weeks and if complainant is eligible, they may contact the Financial Ombudsman Service.



6.2. If the complaint can be resolved within 3 working days

If the complaint can be resolved within 3 working days, acknowledgement letter and holding letter are not required, the Firm shall write only the final response letter to the complainant. For eligible complainant, the final response should inform about their option to refer to the Financial Ombudsman Service.

6.3. Forwarding a complaint

If the Firm have the reasonable grounds to believe that another party is solely or jointly responsible for the complaint, the Firm may forward that complaint to that party. The Firm must inform to the complainant, why the complaint has been forwarded and the contact details of that party. If the Firm receives a complaint from another party, the Firm will treat it as if the Firm have received the complaint directly and same timeline shall be applied from the date when the Firm received the forwarded complaint.

6.4. By when you need to file a complaint

If the Firm receives a complaint outside the time limits for referral to the Financial Ombudsman Service, then, the Firm may reject the complaint and explain about it in the final response letter.

The Financial Ombudsman Service will not examine below cases:

- More than 6 months have passed after respondent sent the final response to the complainant.
- More than 6 years have passed after the event complained about took place.
- More than 3 years have passed since when complainant realizes that there is a cause for a complaint. If the Firm receives a complaint outside the time limits for referral to the Financial Ombudsman Service, then, the Firm may reject the complaint and explain about it in the final response letter.

7. Flow with more details

7.1. Complaints Management Function receives a complaint whether verbal or written.

7.2. Contact related people to collect further information and evidence where necessary.

7.3. If the case looks like it can reach its conclusion within 3 working days, proceed to

index 7.9.

7.4. Write an acknowledgement letter within next working day.

7.5. Keep a record of the case in Complaints Log.

7.6. Analyze impartially and promptly;

Subject matter of the case

Whether the complaint should be upheld or not

Corrective measures and counter measures

Whether another party is involved or not and whether that party is solely or jointly responsible for the alleged complaint.

7.7. If necessary, forward the complaint to that party whom shall bear the responsibility whether solely or jointly. If any complaint is forwarded to another party, the Firm will inform about it to the complainant in a timely manner.

7.8. If after 4 weeks, and the case is still not resolved, write a holding letter to the complainant noting the expected resolution date.

7.9. If the case is resolved, inform complainant about it through its final response. If the complainant is eligible, inform them that they may refer to Financial Ombudsman Service if they are dissatisfied with the Firm's response. The complainant may be able to take civil action as well.

7.10. The final response letter must clearly state the outcome whether complaint is accepted or rejected. The letter must clearly state the reasons for its decision. If any, letter will detail the remedial action, redress offered and any compensation along with its calculation method.

7.11. Along with final response letter, enclose an explanatory leaflet providing information on Financial Ombudsman Service. If the complainant is still dissatisfied, they may approach the Financial Ombudsman.

7.12. Adhere to that remedial action, redress or compensation accepted by the complainant.

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7.13. Carry out root cause analysis. Record the complaint, the reaction, redress or compensation offered in the Complaints log.

7.14. Involve higher management and see if there is any need to change the Firm's procedures.

8. Record keeping of MiFID complaints

For each MiFID complaint, complaint in collective portfolio management for UCITS, EEA or UCITS scheme, and the corresponding countermeasures, a record will be kept for at least five years. For all other complaints, a record will be kept for three years from the date the complaint was received.

9. Reporting complaints to FCA

The Firm must report to FCA all Non-MiFID complaints from eligible complainants and all MiFID complaints to the FCA. The reporting will take place twice a year.

10. Breaches

Any breaches of the Complaints Policy must be recorded in the breach log.

11. Financial Ombudsman Service

Exchange Tower

London

E14 9SR

Tel: Calling from fixed line 0800 023 4567

Calling from mobile 0300 123 9123

Calling from abroad: +44 20 7964 0500

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

Website: www.financial-ombudsman.org.uk