

# Complaints Policy

## 1. Introduction

Alpha Real Capital LLP (“Alpha Real”, “we” or the “Firm”) is authorised and regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom. We are required to have in place effective and transparent procedures for the reasonable and prompt handling of complaints received from complainants.

This document sets out the complaints handling procedures that the Firm will follow in the event that it receives a complaint.

## 2. Does this policy apply to you?

You may complain to us if you are a retail client, professional client or eligible counterparty (in relation to eligible counterparty business).

Please note, however, that if you are not an eligible complainant then you will not be able to refer your complaint to the Financial Ombudsman Service (“FOS”), in the event that you are not satisfied with the way we have handled your complaint.

An eligible complainant is defined as a:

- Private individual;
- “Micro-enterprise” - a business that has fewer than 10 employees and a turnover/annual balance sheet not exceeding 2m euros;
- Charity which has an annual income of less than £1 million; or
- Trustee of a trust which has a net asset value of less than £1 million

at the time that you refer the complaint to us.

## 3. How can you make a complaint?

You can make a complaint by any reasonable means – for example, letter, email, telephone or in person. It is free of charge to complain.

## 4. What will we do once we receive your complaint?

Your complaint will be referred to our Compliance Officer as soon as possible. In the event that the Compliance Officer is involved in the subject matter of the complaint, your complaint will be referred to another partner of the Firm.

We will promptly acknowledge your complaint in writing. In this acknowledgement we will provide the name and title of the person that is handling your complaint. We have given this individual the authority necessary to investigate and settle the complaint. We will also include a copy of this policy.

## 5. Investigating and resolving your complaint

We will investigate your complaint fairly, consistently and promptly, determine whether the complaint should be upheld, and (if appropriate) determine remedial action and/or redress. We will set out our conclusions in a final response to you.

If we decide that redress is appropriate, we will aim to provide you with fair compensation for any acts or omissions for which we are responsible. If you accept our offer, we will promptly provide the compensation to you.

## 6. Our timetable for responding to you

Once we have acknowledged your complaint, we will keep you informed of our progress. Within eight weeks of us receiving your complaint we will send you either a final response or a written response which explains why we are not in a position to make a final response to you and when we might be expected to provide one.

If you are an eligible complainant, our response will also:

- Inform you that you may refer the complaint to the FOS; and
- Enclose a copy of the FOS standard explanatory leaflet.

## 7. Financial Ombudsman Service

If you are an eligible complainant, you are able to refer a complaint to the FOS if you are not satisfied with the outcome of your complaint. Your rights are set out in the FOS’s leaflet Your Complaint and the Ombudsman, which we will provide to you as part of the complaints process. Please remember that if you wish to refer a complaint to the FOS, you must do so within 6 months of us sending you our Final Response.

We will fully cooperate with the FOS and will promptly comply with any settlements or awards made by it. You have the right to ask the FOS to review your complaint if we’ve been unable to resolve it within 8 weeks.

If you are unsure whether the Financial Ombudsman Service will consider your complaint, please contact them directly for advice. The service they provide is free and impartial and contacting them at any stage of your complaint will not affect your legal rights.

You can obtain more information about the Financial Ombudsman Service, ascertain their contact details and get details of how to refer your complaint to them at <https://www.financial-ombudsman.org.uk>.

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## 8. Closing complaints

We will regard your complaint as closed in the following circumstances:

- Once we have sent you a final response; or
- Where you have told us in writing that you accept an earlier response that we have sent to you; or
- If you refer your complaint to the FOS, when the FOS informs us that the complaint has been closed.

## 9. Questions

If you have any questions about our complaints process, you can contact our Compliance Officer in one of the following ways:

Post:  
338 Euston Road, London, NW1 3BG

Telephone:  
+44 (0)20 7391 4706

Email:  
[karldevon-lowee@alpharealcapital.com](mailto:karldevon-lowee@alpharealcapital.com)