

JULY 2020

COMPLAINT HANDLING POLICY AND PROCEDURE SUMMARY

Societe Generale London Branch

Introduction

Building strong and lasting relationships with our clients is important to us. Societe Generale London Branch (“SGLB”) is committed to providing a high standard of service to its clients at all times. However, we know that sometimes things can go wrong and when this happens we encourage clients to tell us about it. Informing us when you are unhappy with one of our products or services provides us with an opportunity to put the matter right and ensures that we improve our service to you and to all our clients generally.

SGLB adheres to a rigorous Complaints Handling Policy and Procedure – the SG London Complaints Handling Policy and Procedure. This document summarises the SG London Complaints Handling Policy and Procedure (“Policy”).

Application

SGLB treats all complaints from all types of clients and potential clients fairly and promptly and in compliance with all laws and regulatory requirements. In doing so, SGLB will investigate all complaints competently, diligently and impartially.

In addition, SGLB must comply with certain additional regulatory requirements in relation to complaints made by “Eligible Complainants”, certain complaints related to payment services under the Payment Services Regulations (“PSR”) 2017 and complaints related to investment services under the Markets in Financial Instruments Directive (“MiFID”).

An “**Eligible Complainant**” is:

- A natural person (i.e. an individual human being) acting outside his/her trade, business or other profession; or
- A micro-enterprise with fewer than 10 employees and having a turnover or balance sheet not exceeding €2 million; or
- A small business having an annual turnover of less than €6.5 million that either employs fewer than 50 people or has a balance sheet total of less than €5 million; or
- A charity with an annual income of less than €6.5 million; or
- The trustee of a trust with a net asset value of less than €5 million, or
- A guarantor, who is an individual who has given a guarantee or security in respect of an obligation or liability of a person who is a micro-enterprise or a small business; or
- In certain cases, a Politically Exposed Person (“PEP”).

All Eligible Complainants may be entitled to take their complaint to the Financial Ombudsman Service (“FOS”).

A “**PSR complaint**” is a complaint made by a client about certain aspects of a payment services offered by SG London (specifically, complaints relating to Parts 6 and 7 of the Payment Services Regulations 2017).

A “**MiFID complaint**” is a complaint made by a client about the provision of a MiFID investment service.

Definition of a complaint

A complaint is any expression of dissatisfaction, about the provision of, or failure to provide, a financial service or a redress determination, where the complainant alleges that he or she has suffered or may suffer a financial loss, material distress or material inconvenience.

A complaint can be oral or written. It need not be accompanied by reasons or explanation. A request for explanation, clarification or general advice is not a complaint.

How to complain

SGLB is committed to providing its clients with the best possible service. However, if at any point you become unhappy or concerned about a service we have provided then you should inform us immediately so that we can do our best to resolve the problem.

If you have a complaint, you or a third party acting on your behalf may express your concerns, either verbally or in writing to:

- a) the person who is your regular contact at SGLB; or
- b) SGLB Head of Compliance
One Bank Street
London
Canary Wharf
E14 4SG
United Kingdom

We will do our very best to resolve your complaint as soon as possible. In doing so, we may ask for any additional information where necessary.

Acknowledging and Responding to your complaint

The timeline for responding to a complaint depends of the type of complaint.

PSR Complaints

For PSR complaints, we will provide you with a final response within 15 business days following receipt of your complaint, or in exceptional circumstances (being only a situation beyond SGLB's control) within 35 business days following receipt of your complaint.

For all complaints other than PSR complaints

As soon as possible and by no later than 10 business days following receipt of your complaint, we will provide you with a written "**Acknowledgement**" of your complaint. This Acknowledgement will either:

- Respond to your complaint in full; or
- Indicate that we need further time to properly investigate your complaint and set out when we expect to provide you with a response. In all cases, we will respond within eight weeks from the date we receive your complaint.

If we can resolve your complaint within three business days following receipt of your complaint, we will provide you with a written "**Complaint Resolution Summary**". The Complaint Resolution Summary will acknowledge your complaint and will set out the findings of our full investigation of the matters giving rise to your complaint and our view of whether your complaint should be upheld or not and if so what remedial action and/or redress we feel is appropriate.

If we cannot resolve your complaint within three business days, we will provide you, within eight weeks of receiving your complaint, with either:

- a "**Final Response Letter**" – which will set out the findings of our full investigation of the matters giving rise to your complaint and our view of whether your complaint should be upheld or not and if so what remedial action and/or redress we feel is appropriate; or
- a "**Further Written Response**" which:
 - i. explains why we are not in a position to make a final response; and
 - ii. explains when we expect to provide you with a final response.

If you are an Eligible Complainant, when we send you a Complaint Resolution Summary, a Further Written Response or a Final Response Letter, we will also inform you that:

- if you subsequently decide that you are dissatisfied with the resolution of the complaint, you may now be able to refer the complaint to the FOS and must do so within 6 months; and
- further information about making a complaint to the FOS can be found on the website of the FOS at: www.financial-ombudsman.org.uk

Resolving the complaint

A complaint is resolved when you indicate, either verbally or in writing, acceptance of our findings as set out in our Summary Resolution Communication or our Final Response Letter.

If we do not hear from you within 8 weeks of the date of the Summary Resolution Communication or the Final Response Letter, we will consider your complaint closed.

If you are dissatisfied with the resolution of the complaint, you can use alternative channels to obtain redress:

- If you are an Eligible Complainant, you may have recourse to the FOS.
- In relation to payment services, you may be entitled to:
 - submit information to the Financial Conduct Authority by post to 12 Endeavour Square, London, E20 1JN or online at <https://www.fca.org.uk/contact>, where you feel that we have failed to meet our legal requirements; or
 - make a PSR complaint to the Payment Systems Regulator by post to 12 Endeavour Square, London, E20 1JN or via email to PSD2Complaints@psr.org.uk.
- All clients are entitled to start proceedings in a civil court.

Client awareness

This summary document is provided to all clients or potential clients:

- at, or immediately after, the point of sale; or
- where the activity does not involve a sale, at or immediately after the point when contact is first made with an Eligible Complainant; and
- upon request; and
- when acknowledging a complaint from an Eligible Complainant.

This summary document is available on our website.

Societe Generale is a French credit institution (bank) authorised and supervised by the European Central Bank (ECB) and the Autorité de Contrôle Prudentiel et de Résolution (the French Prudential Control and Resolution Authority) (ACPR) and regulated by the Autorité des marchés financiers (the French financial markets regulator) (AMF). Societe Generale SA, is authorised by the ECB, the ACPR and the Prudential Regulation Authority (PRA) and subject to limited regulation by the Financial Conduct Authority (FCA) and the PRA. Details about the extent of our authorisation, supervision and regulation by the above mentioned authorities are available from us on request.