
Jefferies International Limited

Leucadia Investment Management Limited

Complaints Handling Policy

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Version 2.1

Supersedes all previous Compliance Policies regarding this subject matter

Jefferies International Limited / Leucadia Investment Management Limited

Jefferies

Table of Contents

I.	INTRODUCTION	2
II.	HOW A CLIENT CAN COMPLAIN	2
III.	REPORTING COMPLAINTS INTERNALLY	3
IV.	RESPONDING TO CLIENT COMPLAINTS AND TIMINGS	3
V.	WHAT TO DO IF THE COMPLAINT REFERS TO ANOTHER FIRM	4
VI.	WHAT TO DO IF THE COMPLAINT IS UNRESOLVED	4

I. INTRODUCTION

Jefferies International Limited (“JIL”) and its wholly owned subsidiary Leucadia Investment Management Limited (“LIML”) (together the “Firm”) recognize that, from time to time, clients or potential clients may have cause to complain about the products or services we provide. Where a complaint is received from a client, we want to ensure that it is properly recorded, evaluated, escalated, investigated (as appropriate) and fully resolved as far as possible to the client’s satisfaction. A response must be provided to any client who has submitted a complaint at the earliest opportunity and without undue delay.

A complaint is defined, by applicable law and for the purposes of this policy, as any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the provision of (or failure to provide) a financial service or redress determination. In short – any expression of dissatisfaction addressed to the firm by a client or potential client relating to the provision of investment services.

This policy applies to all types of clients, including potential clients, and the Firm will apply this policy equally regardless of whether the client is a retail client, professional client (both per se and elective professionals), eligible counterparty or potential client.

The Firm has internal complaint handling procedures in place which must be followed.

II. HOW A CLIENT CAN COMPLAIN

We encourage our clients to address all day-to-day questions about the operation of accounts to the relevant Account Executive, as the person primarily responsible for the products and services provided. However, a client may make their complaint to anyone at the Firm.

We would also encourage, for reasons of certainty, that our client provides the complaint to us in writing. However, a client may make a complaint in writing, verbally, by telephone or in person. Under no circumstances will the Firm charge a client for submitting a complaint.

Any communication should be addressed to the Account Executive (or to the name of the person the client has complained to, as applicable). If for any reason, the client feels like they cannot complaint to the Account Executive, clients should be advised that they can submit their complaint to the JIL/LIML Head of Compliance who assumes responsibility for the complaints management function. The contact details for the JIL/LIML Head of Compliance are set out below:

- Anne Breslin, Head of Compliance, Jefferies International Limited, Vintners Place, 68 Upper Thames Street, London, EC4V 3BJ
- ABreslin@Jefferies.com
- +44 (0)20 7029 8646

Where the Complaint relates to the Head of Compliance, the complaint should be directed to the JIL Board using the following details:

- Tim Cronin, President of JIL & Head of International Fixed Income, Jefferies International Limited, Vintners Place, 68 Upper Thames Street, London, EC4V 3BJ
- TCronin@Jefferies.com
- +44 (0)20 7029 8432

III. REPORTING COMPLAINTS INTERNALLY

The Compliance function will be responsible for the internal treatment and investigation of all complaints. Compliance will handle complaints effectively and in an independent manner.

In relation to every complaint received, a written summary of the complaint must be prepared immediately and provided to the Compliance Department without undue delay, copying the relevant business manager. The complaint summary must include the complainant's full name and address (and, if relevant, account number(s)), the time and date of receipt of the complaint, and a full description of the subject matter of the complaint as provided. Where the complaint is written, a copy of the written complaint must be attached to the summary. Where the complaint is oral, a copy of any contemporaneous notes taken should also be attached to the summary, including a note of any initial oral response provided (although note the comments below about not handling a complaint yourself).

Every complaint received must be reported to Compliance, regardless of whether or not you view the complaint as justified, and regardless of its substance.

Where a substantive response requires further investigation then that investigation will be promptly undertaken by the Compliance Department (see Section IV below). Where a substantive response can be given to a complaint summarily without further investigation a full note of any such response must be prepared and attached to the summary of the complaint to be supplied to the Compliance Department referred to above.

Compliance may request additional information on the matter, and where this is the case this should be provided, where known, in a timely manner.

IV. RESPONDING TO CLIENT COMPLAINTS AND TIMINGS

Complaints received must be reported to Compliance immediately, and without undue delay, in accordance with the procedures set out above. Complaints will be evaluated and, as appropriate, investigated by the Compliance Department and Senior Management, where appropriate.

Once a complaint has been received by Compliance, a written acknowledgment must be sent promptly to the complainant acknowledging receipt of the complaint and confirming the complaint is being investigated and dealt with. Information on our Complaints handling process and internal procedures must accompany this written acknowledgement. We must then do our best to resolve the complaint as quickly as possible.

Compliance will investigate the complaint in a competent, diligent and impartial manner, obtaining additional information where this is needed. Compliance will assess the subject matter of the complaint, whether or not the complaint should be upheld, what remedial action or redress (or both) may be appropriate and whether or not we have reasonable grounds to believe that another party may be solely or jointly responsible for the matter alleged in the complaint.

Where a complaint can be resolved quickly, we will send the client a summary resolution document to confirm how the complaint has been reviewed and closed and will offer where we decide this is appropriate any redress or remedial action and explain our decision on it.

If the complaint is complex in nature, an extensive investigation may be required. If this is the case, we will confirm to the client that the complaint has been received, and who the main point of contact is in line with the procedures outlined above, and begin our investigation.

In assessing a complaint we will consider all the evidence available and the particular circumstances of the complaint, similarities with other complaints received by the firm, relevant guidance published by the FCA and the FOS and analyse any decisions by the FOS concerning similar complaints received by us. We must keep the client up-to-date with our progress throughout the investigatory process.

The complainant must be kept informed of the progress of the complaint, and the measures being taken for the prompt resolution of their complaint. Any offer of remedial action or redress that we offer to, and which is accepted by, the complainant must be complied with promptly.

Once the investigation is complete, the complaint, the outcome of the investigation, and the proposed approach to the response shall be assessed and prepared by the Compliance Department in consultation with the relevant business manager. The Compliance Department will then prepare a written response to the complainant, which will be sent to the client seeking to achieve an agreed resolution of the complaint. This response must communicate our position on the complaint, inform the client of their options and include mention of the possibility to refer the complaint to FOS (see below). All communications with the complainant must be clear, in plain language, and easy to understand.

We must communicate a final response to the client which meets the criteria set out in the FCA Rules, within 8 weeks. On sending a final response, we will give the client details of the Financial Ombudsman Service (FOS), including their website address and enclose a copy of the FOS's standard explanatory leaflet. If complainants are still unsatisfied with our response, they may be referred to the FOS. Where a complaint is referred to the FOS we will cooperate fully with FOS and comply promptly with any settlements or awards made by it.

If after eight weeks a final response has not been sent to the complainant, a written response explaining why we are not currently in a position to make a final response and when one will be provided should be sent to the complainant. At this eight week stage where a final response has not been given, the complainant may refer the complaint to the FOS.

V. WHAT TO DO IF THE COMPLAINT REFERS TO ANOTHER FIRM

If we believe that another firm, for example a product provider firm, is solely responsible for the fault alleged in the complaint, we will refer it onto that firm so that they may conduct their own evaluation and respond to the client. If we refer your complaint to another firm we will notify the client that we have done so and will provide them with the other firm's contact details.

Where we believe that we may be jointly responsible with another firm for the fault alleged in the complaint, we will refer the complaint on and notify the client as detailed above. In addition, we will conduct an evaluation and, as appropriate, investigation into that part of the complaint for which we are responsible and will respond to the client in accordance with our procedures above.

VI. WHAT TO DO IF THE COMPLAINT IS UNRESOLVED

We consider complaints to be resolved where the client has indicated acceptance of our response. If our substantive response does not resolve the client's complaint to the satisfaction of the client, they may be able to take civil action or be entitled to refer the matter to the Financial Ombudsman Service free of charge.

The FOS is an independent public body whose job is to resolve individual disputes between consumers and businesses – fairly, reasonably, quickly and informally. For further information please visit <http://financial-ombudsman.org.uk>. When we send our final response or holding response to the client, we will advise the whether or not they are eligible to consider this service and, if they are, provide them with an explanatory leaflet.