

COMPLAINTS PROCEDURE

At **VanEck Securities UK Limited** ("we"), we are committed to dealing with complaints fairly, promptly and objectively. Please see the details of how to make a complaint below depending on the service you wish to complain about.

We aim to always provide excellent levels of service. Even so, we appreciate that there may be occasions when clients have a complaint, and we encourage this feedback to enable us to put things right and to use the information gained to improve our services. These procedures seek to respond in a fair and impartial way to clients and other connected parties, who express dissatisfaction about our provision of, or failure to provide, a financial service.

We take every complaint seriously and your complaint will be handled in accordance with the relevant FCA rules. We aim to resolve every complaint fairly and in a timely manner.

We have a written internal complaint handling policy, as required by the FCA Rules, which provides full details of the procedures we and Sturgeon Ventures LLP, our FCA regulated principal, will adhere to when handling your complaint. You can obtain a copy of this on request

HOW TO COMPLAIN

You may complain to us in the most convenient way for you: either by letter, telephone or email. Should you wish for someone to complain on your behalf, we will need your written permission to enable us to deal with them. Many concerns can be resolved immediately; therefore, in the first instance, it may be more beneficial to speak to your usual relationship contact.

However, to make a formal complaint about any issue relating to our services or this website, please notify us in writing, either to ourselves, at:

Legal and Compliance Department Europe, VanEck Securities UK Limited
50 Broadway
London, SW1H 0BL
Phone: +49 (0) 69-4056 695-0
Email: complaints@vaneck.com

Or to our FCA authorised Principal, Sturgeon Ventures LLP, at:

The Compliance Officer, Sturgeon Ventures LLP
2nd Floor, Unit D, Heathmans House, 19 Heathmans Road, London SW6 4TJ
Telephone: 0203 167 4625
Email: complaints@sturgeonventures.com

WHAT HAPPENS NEXT?

If we are unable to resolve your complaint immediately, we will aim to resolve your concerns as soon as possible. You will be issued with an acknowledgment letter promptly and we will keep you informed regarding the progress of your complaint. You will not be charged for any aspect of us handling your complaint.

We will fully investigate your complaint and send you a response which clearly details our findings and the outcome of your complaint. We will also detail any proposed actions to put things right,

if appropriate. We will aim to complete this process promptly and will provide you with regular updates.

Upon completion of our investigations, we will, no later than by the end of eight weeks following our receipt of the complaint, issue you with either:

- (i) a final response, being a written response from us which:
 - a) accepts the complaint and, where appropriate, offers redress or remedial action; or
 - b) offers redress or remedial action without accepting the complaint; or
 - c) rejects the complaint and gives reasons for doing so;

and which:

- d) encloses a copy of the FOS standard explanatory leaflet;
- e) provides the website address of the FOS; and
- f) informs the complainant that if they remain dissatisfied with our response, they may now refer their complaint to the FOS and must do so within six months;

or,

- (ii) written response which:
 - a) explains why we are not in a position to make a final response and indicates when we expect to be able to provide one;
 - b) informs the complaint that they may now refer the complaint to the FOS;
 - c) encloses a copy of the FOS standard explanatory leaflet; and
 - d) provides the website address of the FOS.

Please note, however, that the services of FOS in relation to complaints are only available to certain categories of complainants, being in summary individual customers or lenders or small businesses, charities and trusts. The FOS's website provides additional detail on this: <https://www.financial-ombudsman.org.uk/consumers/expect/who-we-can-help> .

THE FINANCIAL OMBUDSMAN SERVICE (FOS)

We will always aim to resolve your complaint promptly and fairly. If, in accordance with the procedure set out above, we are unable to provide a final response to your complaint within eight weeks, or if you remain dissatisfied following receipt of our final response, you may refer your complaint to the Financial Ombudsman Service:

Financial Ombudsman Service
Exchange Tower London
E14 9SR Telephone: 0800 023 4567
Email: complaint.info@financial-ombudsman.org.uk
Website: www.financial-ombudsman.org.uk

The Financial Ombudsman Service is an independent dispute resolution service. There is no charge for you to use their services.

REFERRING YOUR COMPLAINT TO ANOTHER FIRM

Where we believe that another firm may be solely, or jointly, responsible for the fault alleged in your complaint, we will refer your complaint to that firm for investigation and reply. Where we are satisfied that we may have some responsibility for the fault alleged in your complaint, we will investigate your complaint in accordance with these procedures.

If you contact either us or Sturgeon Ventures LLP in relation to a complaint about any investment product for which we have provided information on this website, we will promptly pass your contact information and details of the complaint onto the relevant product manufacturer for their attention and appropriate response.

FURTHER INFORMATION

If you have any queries regarding our complaint handling procedures, or the process of your complaint, please contact both us and Sturgeon Ventures LLP in writing, at the details provided above.