

**GLOBAL SHARES EXECUTION SERVICES LIMITED  
COMPLAINTS HANDLING PROCEDURE**

## 1. Introduction

Global Shares Execution Services Limited (“GSESL” or “the Firm”) is licensed to conduct investment services business under the Investment Services Act as authorised by the Malta Financial Services Authority (“the MFSA”) pursuant to licence number GSES-IF-14206. GSESL offers receipt and transmission of orders and ancillary services; foreign exchange services (where these are connected to the provision of investment services activities), and safekeeping and administration of financial instruments (for the account of clients).

J.P. Morgan Workplace Solutions is a brand name for equity compensation administration business conducted by Global Shares and other financial products and services offered through J.P. Morgan Securities LLC and other affiliates of J.P. Morgan Chase & Co.

Under the EU Markets in Financial Instruments Directive 2014/65/EU (‘MiFID II’), Global Shares Execution Services Limited (“the “Firm”) is required to have a Complaints Handling Procedure.

The purpose of this document is to outline the Firm’s procedure for handling a complaint received from a client of GSESL. We recognise that regrettably from time to time clients may have cause to complain about the service we provide to them. Where a complaint is received from a client we want to ensure that it is investigated properly and that wherever possible the complaint is resolved, and a response provided to you at the earliest convenience.

## 2. How to make a complaint

If you are a client of GSESL and are dissatisfied with any aspect of the service we have provided to you, you can raise a complaint with us. In the first instance, we strive to resolve any issues or concerns you may have in a fair, transparent and timely manner. However, if you still wish to make a complaint, please include as much information as possible to enable us to identify you and fully investigate your complaint, including your full name, address, scheme name and client account number. Please briefly set out all the facts regarding the issue and providing useful information such as any relevant dates, the details of the issue being complained of, any Global Shares staff contacted and copies of any documentation supporting your complaint. It is also advisable to inform us of how you can be contacted in case we need to obtain further information.

You can provide your complaint to us using any of the following options:

- Using the **Contact Us** or **Helpdesk** page on your Global Shares Equity Gateway account portal
- By email: [support@globalshares.com](mailto:support@globalshares.com)
- By telephone: **Dial** +353818000079 or +443308080142
- By Post: GSESL Complaints Officer, c/o Global Shares West Cork Technology Park, Clonakilty, Cork P85 EY90, Ireland

## 3. The Investigation Process

The Firm has internal policies and procedures in place to address how complaints are managed by the Firm. Once we have received your complaint, we aim to resolve the issue as quickly as possible and in a consistent manner.

Upon receipt of your complaint, it will be reviewed and fully investigated to ensure we identify the most appropriate resolution.

If your complaint cannot be resolved swiftly an acknowledgement will be sent to you within 5 business days from the date of receipt of the complaint. The acknowledgement will confirm receipt of your complaint and will advise you who will be responsible for the investigation, and in instances where you have complained verbally, it will record our understanding of your complaint.

We aim to respond to any complaint as quickly as possible, but some complaints may take longer to resolve due to their complexity or the need to obtain further information.

We would normally hope to send a final response to you within 15 business days of receiving your complaint. In the unlikely event that we are unable to resolve your complaint within 15 business days after receipt we will advise you in writing providing an explanation for the further delay and when we

expect to be able to provide a final response and your right to refer to the matter to either the Office of the Arbiter for Financial Services (OAFS) in Malta or the Financial Services Ombudsman in Switzerland (FINSOM), depending on where you currently reside (further information outlined below).

#### 4. Taking your complaint further (non-Swiss resident)

If, following completion of the Firm's complaints process, you are still not satisfied with the response, you have the right to refer the complaint for alternative dispute resolution via the Office of the Arbiter for Financial Services (OAFS). Contact details for the [OAFS](#) are included below.

#### 5. Taking your complaint further (Swiss resident)

If you are a resident of Switzerland and, following completion of the Firm's complaints process, you are still not satisfied with the response, you have the right to refer the complaint for alternative dispute resolution via the Financial Services Ombudsman in Switzerland (FINSOM). Contact details for [FINSOM](#) are included below.

The Swiss Financial Services Act (FinSA), which came into effect on 1 January 2020, specifies the rules of conduct that financial service providers must adhere to in order to strengthen investor protection and increase market transparency.

Markets in Financial Instruments Directive 2014 (2014/65/EU) ("MIFID II") and FinSA apply both to financial services provided to clients domiciled in Switzerland as well as to financial services provided in Switzerland.

Therefore, if you are a resident of Switzerland, as the Firm currently provides regulated services to residents of Switzerland, the Firm is required to adhere to MIFID II and the above mentioned FinSA rules.

#### 6. Contact Details for OAFS and FINSOM

##### **OAFS**

Online Enquiry Form	-	<a href="https://www.financialarbiter.org.mt/oafs/enquiry">https://www.financialarbiter.org.mt/oafs/enquiry</a>
Online Complaint Form	-	<a href="https://www.financialarbiter.org.mt/oafs/complaint#">https://www.financialarbiter.org.mt/oafs/complaint#</a>
Phone (in Malta)	-	80 072 366 (free for landline calls only) (+356) 21 249 245 (normal call rates apply) 79219958 or 79219961 (mobile call rates apply)
Phone (outside Malta)	-	+356 (or 00356) 21249245 (standard overseas call rates apply) +356 79219958 or +356 79219961 (mobile call rates apply)
Mailing Address	-	Office of the Arbiter for Financial Services N/S in Regional Road Msida MSD 1920 Malta

##### **FINSOM**

Online Enquiry Form	-	<a href="https://finsom.ch/homepage/mediation-access/">https://finsom.ch/homepage/mediation-access/</a>
Phone	-	+41 27 552 04 24
Email	-	<a href="mailto:info@finsom.ch">info@finsom.ch</a>
Mailing Address	-	Avenue de la Gare 66, 1920 Martigny, Switzerland