

LONDON CIV COMPLAINTS HANDLING PROCEDURES

1. Client Complaints Management Procedures

1.1 Who should a complaint be addressed to?

Partner Funds are encouraged to address any expression of dissatisfaction with their dedicated London CIV Client Relationship Manager ('CRM'), who will determine whether the concern being raised is a formal complaint or whether it is feedback. If it is determined that a formal complaint is being made, the CRM will escalate the matter to the Chief Proposition Officer ('CPO') and Chief Risk Officer ('CRO') immediately.

Alternative, the complainant may wish to address their complaint directly to:

Andrien Meyers

Chief Proposition Officer, London CIV, 22 Lavington Street, London SE1 0NZ

(Email: Andrien.Meyers@londonciv.org.uk). Or,

Sarah Nowell

Chief Risk Officer, 22 Lavington Street, London SE1 0NZ (Email: Sarah.Nowell@LondonCIV.org.uk Tel: 0208 036 8989)

1.2 Format of complaints

In order to best manage concerns raised, it is preferable that the complainant sets out their complaint in a letter or email. The complainant can, if they prefer, make a complaint by any other method such as via telephone or in person.

The remainder of these procedures relate to complaints related to the provision of FCA regulated services, i.e., an investment in a collective investment scheme managed ('CIS') by London CIV or engagement with one of London CIV's segregated client account services ('SCA'). Any other concerns raised will be dealt with on a case-by-case basis.

2. The Process

2.1 Timescale for initially responding to Client complaints

Once in receipt of a qualified Client complaint London CIV will acknowledge the complaint promptly in writing to the complainant, no later than the close of the third business day after the complaint is received.

If the Client complaint relates to a SCA, the initial response will also include:

- a. A summary of London CIV's complaints handling procedures (i.e., this document);
- b. Reassurance that the complaint has been received and is being dealt with;
- c. Re-state that the client is not an "eligible complainant" as defined by the Financial Ombudsman Service ("FOS but may be able to take a civil legal action.
- d. The fact that London CIV will keep the complainant informed of the progress of the investigation.

The communication acknowledging the Client complaint will be drafted by the CPO and signed off by the CRO before submission to the complainant.

2.2 Investigation of complaints

Where a formal Client complaint is received and identified, this is reported to the CPO and CRO immediately. The CRO will confirm whether the concern being raised is in fact a Client complaint in scope of these procedures. The CRO will then coordinate an investigation with members of the Compliance and Risk Function (C&R) and ensure that the investigation is independent, fair, consistent, and prompt to determine whether it should be upheld and, if so, what remedial action or redress may be appropriate. If the Client complaint is not upheld the CRO will provide an explanation for their conclusion. C&R shall seek to resolve any Client complaints at the earliest opportunity with the aim of doing so within eight weeks of receipt of the initial complaint.

Ultimately, London CIV will aim to resolve the complaint by the end of the 8th week from receipt of the initial complaint. Should the resolution of a MiFID complaint go beyond the 8th week, London CIV will inform the complainant of the need for an extension which will be for no longer than an additional 4 weeks, with regular updates provided to the complainant until a final outcome is provided.

2.3 London CIV Final response

This will either:

- i. uphold the complaint and, where appropriate, offer redress or,
- ii. reject the complaint and give reasons for doing so.

If the Client complaint relates to a SCA, the response will also reiterate that the Partner Fund/Client is not an eligible complainant, and therefore cannot refer their complaint to the FOS, but may seek civil action.

3. Governance

The Complaints Management Procedures is owned and implemented by the CPO, who is also responsible for ensuring that appropriate training on dealing with client complaints is delivered to the relevant staff.

Complaints Management Procedures is approved by the Executive Committee and reviewed by the CPO at least annually.

Client complaints data and the effectiveness of the complaints management procedures are reviewed by C&R at least annually, with the findings reported to the Risk and Compliance Committee and the Compliance, Audit and Risk Committee.