



UNIGESTION UK LIMITED

Complaints Management Policy

Signatory of:





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1. INTRODUCTION

All firms regulated by the FCA, the SEC or NFA/CFTC are required to have a written procedure for the effective consideration and proper handling of complaints from clients, former clients and prospective clients. Unigestion UK Limited's Complaint Management Policy and the accompanying procedures are detailed below. All employees are required to follow these procedures in respect of any complaints received.

This policy only applies to complaints that are linked/related to business activities of Unigestion US and UK, including MIFID and AIFM activities.

The provisions of this Complaints Management Policy which have a grey background apply to complaints made by complainants who are Eligible Complainants and so eligible to have a complaint considered under the UK Financial Ombudsman Service (FOS). For these purposes, an Eligible complainant generally refers to a customer who is not a professional client and the definition has been extended to include as consumer, an individual acting for the purposes, which are wholly or mainly outside that individual's trade, business, craft or profession. This includes a consumer who is an investor in any AIF managed by Unigestion

2. WHAT IS A COMPLAINT?

A Complaint is "any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a client about the provision of, or failure to provide, a financial service or a redress determination which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience".

The Complaints Procedures include the following types of complaint:

- ▶ Complaints received in writing (including email) from the client or a representative of the client;
- ▶ Verbal complaints (either by telephone or in a meeting) from the client that cannot be immediately satisfied and/or where the client is clearly expecting financial settlement or compensation;
- ▶ Any other communication from another party that could be construed as a complaint.

If you are in any doubt as to whether the matter constitutes a complaint or not, please refer the matter immediately to the Compliance team via the MCO 'My Compliance Office' Portal under Miscellaneous – Report or ask a question to the Compliance team.

3. WHO CAN FILE A COMPLAINT?

For the purposes of the Firm's Complaints Policy, "Client" includes a potential client and includes both Professional and Retail Clients as well as Eligible Counterparties when conducting Eligible Counterparty Business.

It is Unigestion UK Limited's policy to allow complaints to be submitted free of charge.

If the complaint is received outside of the time limit for referral to the FOS, the Firm may decide to reject the complaint. In the event of rejecting the complaint the complainant will be sent a final response explaining the Firm's position. The time limit for referral to the FOS is:

- ▶ More than six months after the date on which the respondent sent the complainant its final response, redress determination or summary resolution communication; or
- ▶ More than:
 - Six years after the event complained of; or (if later)
 - Three years from the date on which the complainant became aware (or ought reasonably to have become aware) that he/she had cause for complaint.

4. HANDLING COMPLAINTS

Unigestion UK Limited's Compliance Function has been allocated responsibility for the handling of complaints received from clients or potential clients in an effective and transparent manner. In discharging this responsibility Unigestion UK Limited's Compliance Function is performing the Complaints Management Function with responsibility for the investigation of complaints.

The Compliance Function shall ensure that each complaint is:

- ▶ Handled effectively and in an independent manner;
- ▶ Investigated competently, diligently and impartially, obtaining additional information as necessary.

The Firm's policy is to ensure that all complaints are dealt with promptly and to pay due regard to client interests and treat them fairly.

When dealing with eligible complainants, the Firm will provide them with information about the Financial Ombudsman Service (FOS) including their web address.

When handling a complaint, the Firm shall communicate with clients or potential clients clearly, in plain language that is easy to understand and shall reply to the complaint without undue delay.



The Firm shall comply promptly with any offer of remedial action or redress accepted by the Complainant. Where a complaint is referred to the FOS, the Firm will cooperate fully with them and comply promptly with any settlements or awards made by it.

5. PUBLICATION OF THE COMPLAINTS PROCESS

The Firm's Complaints Management Policy will be published on the Firm's website as well as provided to any client or potential client on request, or when acknowledging a complaint.

The Firm will also provide information in a clear and easily accessible way about the Financial Ombudsman Service – including the Financial Ombudsman Service's website address – <http://www.financial-ombudsman.org.uk/>.

This information will be provided in the Firm's website and in its contracts with its clients.

6. COMPLAINTS HANDLING PROCESS

Unigestion UK Limited has adopted the following procedures in respect of any complaints received:

1. All complaints received by an employee of the Firm must be notified immediately to the Compliance Function via Email. Under no circumstances should an employee who is in receipt of a complaint make any attempt to "talk the client out" of their complaint; nor should they make any admission of liability for the error or omission which is the source of the client's complaint;
2. Upon receipt of notification of a client complaint from any employee the Compliance Function will acknowledge receipt by email and instruct the employee on how to proceed. This will in most cases be to simply confirm to the complainant that their complaint has been received and passed to the Compliance Function for investigation who will be in contact with the complainant shortly. Unless instructed to do so by the Compliance Function the employee should not engage in further correspondence with the complainant in respect of the complaint. If the complainant seeks to discuss the complaint with the employee he/she should seek guidance from the Compliance Function on how to proceed.
3. The Compliance Function will notify Senior Management of any serious complaints or complaints that indicate the possibility of a material loss or a material deficiency in the Firm's systems and controls;
4. A written acknowledgement of the complaint will be provided to the client promptly by the Compliance

Function. The written acknowledgment will outline the process to be followed by the Firm and the anticipated maximum response time in handling the complaint. The acknowledgement will also include the contact details of the Compliance Function.

5. The Compliance Function will investigate the complaint competently, diligently and impartially, obtaining additional information as necessary. The following will be assessed fairly, consistently and promptly:
 - The subject matter of the complaint
 - Whether the complaint should be upheld
 - What remedial action/ redress may be appropriate
 - If appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint
6. Factors that may be relevant in the assessment of a complaint will include the following:
 - All the evidence available and the particular circumstances of the complaint
 - Similarities with other complaints received by the respondent
 - Relevant guidance published by the FCA, other relevant regulators, the Financial Ombudsman Service or former schemes
 - Appropriate analysis of decisions by the Financial Ombudsman Service concerning similar complaints received by Unigestion UK Limited (if any)
7. The Compliance Officer handling the complaint will exercise the final review of any correspondence with the complainant. It is important to ensure that the complainant is kept informed of progress in the handling of their complaint;
8. The Compliance Function maintains appropriate records in relation to each complaint, including evidence obtained and all the supporting correspondence.
9. Once the Compliance Function has decided on the action to be taken to resolve the complaint, they will communicate this to the client promptly.
10. The written confirmation of the resolution of the complaint will advise the complainant of their options, including that they may be able to refer the complaint for alternative dispute resolution (ADR) or commence civil action.
11. The complainant will also be informed of their right to refer their complaint to the FOS. The information about the right to refer the complaint to the FOS will be provided as a final response which will:
 - a. Include a copy of the Financial Ombudsman Service's standard explanatory leaflet
 - b. Provide the website address of the FOS – <http://www.financial-ombudsman.org.uk/>
 - c. Inform the complainant that if, still dissatisfied with the respondent's response, the complaint may now be referred to the FOS
 - d. Outline whether the Firm consents to waive the time limits to refer the complaint to the FOS



- e. Be set out clearly, comprehensibly, in an easily accessible way and prominently outline the right to refer the complaint to the FOS.

7. COMPLAINTS ANALYSIS

The Compliance Function; when discharging the role of the Complaints Management Function; shall be responsible for the analysis of complaints and complaints-handling data so as to ensure it identifies and addresses any risks or issues. The Compliance Function shall be responsible for reporting to Unigestion UK Limited's Senior Management on any risks or issues identified as part of its analysis. This report shall be made at least annually, and more frequently if required.

8. COMPLAINTS REPORTING

Where required or applicable, complaints received by Unigestion UK Limited will be reported to the FCA and/or other relevant regulators.

9. SENIOR MANAGEMENT OVERSIGHT

Responsibility for Unigestion UK Limited's duty to establish, implement and maintain an effective and transparent Complaints Management Policy and accompanying procedures lies with the Firm's Senior Management. This includes the promulgation of new and revised versions of the Complaints Management Policy and oversight of the complaints analysis provided to Senior Management by the Firm's Compliance Function; when discharging the role of the Firm's Complaints Management Function. In this way, the Firm demonstrates Senior Management oversight of the Firm's Complaints Management Process and its ability to take action when deficiencies are identified.