



Complaints

October 2018

The following complaints-handling summary relates to how Securis Investment Partners LLP ("Securis") will approach a complaint from eligible complainants:

In the context of Securis' business, "eligible complainants" are underlying investors in Alternative Investment Funds ("AIFs") managed by Securis who are individuals "acting for purposes which are wholly or mainly outside that individual's trade, business, craft or profession".

Summary of Securis' complaints handling procedure:

- Securis' Compliance Team will deal with all complaints and ensure that the complainant is kept informed on the steps being taken to resolve the complaint.
- Where practicable, the Compliance Team will respond to the complainant on the same day as the complaint is received to at least acknowledge receipt of the complaint and confirm that it is being investigated
- The Compliance Team will explore with staff members the validity and reasons for the complaint and, after a full analysis, promptly respond to the complainant with a fair, clear and not misleading assessment and explanation and, if appropriate, an apology and an assurance that steps have been taken to avoid a recurrence.
- The Compliance Team will also explore whether or not the complainant is claiming any loss and, if so, whether this is the responsibility of Securis or another party.
- In light of the above, the Compliance Team will discuss with the Management Committee of Securis what action and redress may be appropriate and whether or not compensation should be offered to the complainant and, if so, at what level.
- Within eight weeks, the Compliance Team will send a final response to the complainant (unless this has not been possible, in which case the complainant will be provided with an explanation for the delay, together with an indication of when the Compliance Team expects to provide its final response).
- If the complaint is not resolved to the satisfaction of the complainant, the complainant may be entitled to refer the complaint to the Financial Ombudsman Service (www.financial-ombudsman.org.uk).

The following complaints handling summary relates to how Securis will approach a MiFID complaint:

A "MiFID complaint" as defined by the FCA, may arise in relation to the Firm's MiFID business which, for Securis, is the provision of delegated investment management services in connection with a UCITS fund. A complainant for these purposes includes a "client", as defined in MiFID, which includes professional clients (and for the avoidance of doubt also includes potential clients for such services).

You should contact the Firm if there is any aspect of the provision of MiFID investment services provided by Securis that you are not satisfied with. Please write to: compliance@securisinvestments.com. We take every complaint seriously and it will be handled in accordance with the relevant FCA rules. Securis has a written complaints handling policy, a copy of which is available upon request from Securis' Compliance department at the address mentioned.