

Prescient

FUND SERVICES (IRELAND)

Complaints Policy

Version	Reviewer	Description	Date
1		Policy established	July 2019
1	PFSI Legal	Annual Review	October 2020
1	PFSI Compliance	Annual Review	October 2021
1	PFSI Compliance	Annual Review	October 2022
2	PFSI Compliance	Full policy review and restructuring	March 2023

1. Introduction

In accordance with its obligations under the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (S.I. No. 352 of 2011) (the “**UCITS Regulations**”), European Union (Alternative Investment Fund Managers) Regulations 2013 (the “**AIFMD Regulations**”) (together the “**Regulations**”), EU Commission Delegated Regulation (EU) No. 231/2013 (the “**Level 2 Regulation**”) and the Consumer Protection Code 2012, Prescient Fund Services (Ireland) Limited (the “**Company**”) is required to have a complaints handling policy in place.

The Company shall be responsible for ensuring that complaints are handled in accordance with the applicable regulations and that records of all contact with complainants and all records used in the investigation are retained appropriately.

2. Definition of Complaint

For the purpose of this Policy, a complaint is considered to be any expression of dissatisfaction, either oral or written, justified or not, which is about the Company’s provision of, or failure to provide, a service which it has been engaged to provide. The Company requires that all complaints received, either in relation to the Company or the funds (the “**Funds**”) under management, are reported, logged and resolved accordingly.

3. Free of Charge Process

Complainants may make complaints free of charge. Information regarding their complaints or any aspect of the procedure applicable thereto will be made available free of charge and on written request.

4. Receipt of Complaints

Complaints may be received directly by the Company or through any of its delegates such as the Depository, Administrator, Investment Managers and Distributors. Any complaints received shall be promptly notified to the Designated Person appointed with responsibility for complaints handling together with details of the nature of the complaint, identification of the complainant concerned and the date the complaint was received.

5. Complaints Handling

- All complaints must be acknowledged in writing no later than 5 business days. If the complaint cannot be answered in full within a reasonable time frame, a holding letter must be sent to the complainant within the same time frame.
- The complainant must be provided with the name and contact details of the person in charge of the complaint to be the complainant’s point of contact in relation to the complaint until the complaint is resolved or cannot be progressed any further.
- All relevant parties must be kept advised of the action taken through to final resolution of the complaint and be provided with regular updates on paper or on another durable medium on the progress of the complaint no greater than 20 business days starting from

the date on which the complaint was made.

- An attempt must be made to resolve a complaint within 40 business days of the date of receipt of a complaint and failing to resolve it within this timeframe, the complainant must be immediately notified of an expected timeframe for resolution.
- A formal response on paper or on another durable medium will be sent to the complainant within 5 working days of the completion of the investigation, formal responses must include the understanding of the complaint, details of investigations carried out, the outcome of the investigation, and, if applicable reasoning for the provision or non-provision of a financial or other recompense.
- If the complaint is being refuted, the complainant should be given the reasons for the decision and that the complainant can refer the matter to the relevant Ombudsman and the contact details of such Ombudsman.

A complaint is only considered “resolved” where the complainant has indicated acceptance of the response. The acceptance may not be in writing, but positive feedback is required.

6. Ongoing Review

The Company shall ensure that all complaints received are analysed to identify whether they have arisen due to a systemic failure in processes or controls within the Company or at its delegates and address as appropriate any deficiencies.

7. Reporting

- All complaints will be notified to the Board of the Company (and/or the Board of the relevant fund to which the complaint may relate) during the assessment phase and upon resolution.
- The designated person will ensure that the Board of the Company (and/or the Board of the relevant fund to which the complaint may relate) is informed on a regular basis of all complaints received as regards to the complaints’ nature, its background, its financial/legal/regulatory impact, the actions taken for its resolution and steps to prevent reoccurrence.

8. Record Keeping

The Designated Person will ensure a complaints log and file is maintained of all written complaints received, including a record of the responses and the actions, if any taken as a result of the complaints.

This log must contain.

- a) details of each complaint.
- b) the date the complaint was received.
- c) a summary of the regulated entity’s response(s) including dates.
- d) details of any other relevant correspondence or records.

- e) the action taken to resolve each complaint.
- f) the date the complaint was resolved; and
- g) where relevant, the current status of the complaint which has been referred to the relevant Ombudsman.

9. Contact Details – Designated Persons

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