Complaints Management Policy

Introduction

Guinness Global Investors and Guinness Ventures are trading names of Guinness Asset Management. Guinness Ventures Limited is an Appointed Representative of Guinness Asset Management, the Principal Firm, which is authorised and regulated by the Financial Conduct Authority ("FCA").

Guinness Asset Management ("Guinness") is required to have in place clear and effective procedures for the reasonable and prompt handling of complaints. This document sets out the complaints handling procedures that will be followed in the event of a relevant complaint.

Definition of a Complaint

A complaint is any form of dissatisfaction expressed by a customer about any aspect of the service provided by Guinness which involves an allegation that the complainant has suffered, or may suffer, financial loss, material distress or material inconvenience. This can be oral or written and justified or not. Any communication received which does not meet this definition will not be subject to this policy.

Who does this policy apply to?

This policy is in place to protect all direct clients of Guinness, including retail clients of Guinness Ventures.

Investors in funds where Guinness acts as discretionary investment manager, delegated portfolio manager or investment adviser, should contact the relevant Management Company ("Man Co") or Authorised Fund Manager ("AFM") of the funds in the first instance, see **Where to Direct a Complaint** below. Guinness will cooperate fully with such entities in investigating and resolving complaints relating to services provided by Guinness.

If a relevant complaint is received it is our policy to treat all customers, including professional clients and eligible counterparties, in the same way. However, if you are not an eligible complainant, as defined below, you will not be able to refer your complaint to the Financial Ombudsman Service if you are not satisfied with the way we have handled your complaint.

Financial Ombudsman Service ("FOS")

You may be eligible to have your complaint considered under the FOS (contact details below). An eligible complainant is a person eligible to have a complaint considered under the FOS and must be:

- a private individual;
- a business which has a turnover or annual balance sheet that does not exceed €2 million;
- a charity which has an annual income of less than £1 million; or
- a trustee of a trust which has a net asset value of less than £1 million; at the time that the complainant refers the complaint to us.

Your rights are set out in the FOS standard explanatory leaflet, which we will provide you with as part of the complaints process. You should allow our internal complaints procedure to be completed before referring any concerns to the FOS. Any complaint referred to the FOS should be made within six months of receiving our final response.

The Financial Ombudsman Service Exchange Tower
London E14 9SR
Tel: 0800 023 4 567 or 0300 123 9 123
Email: complaint.info@financial-ombudsman.org.uk
Website: www.financial-ombudsman.org.uk

Please note that the availability of external dispute resolution mechanisms may vary depending on the nature of the service provided and the jurisdiction of the relevant investment or fund. Investors in funds for which Guinness acts as investment manager, delegated portfolio manager or investment adviser should refer to the relevant fund documentation and complaints procedures of the responsible fund entity.

Where to direct a complaint
Investors, or potential investors, in the following funds or services, should direct their complaints as set out below:

Fund/Service	Complaints Handler	Contact Details
Guinness Asset Management Funds Plc	Waystone Management Company (IE) Limited	Email: complianceeurope@waystone.com
Waystone UK Investment Funds	Waystone Management (UK) Limited	Email: WTAS-investorservices@waystone.com
Guinness Sustainable Energy UCITS ETF	HanETF Ltd	Email: info@hanetf.com
FP Foresight Funds	FundRock Partners Limited	By writing to: The Compliance Officer, FundRock Partners Limited, Hamilton Centre, Rodney Way, Chelmsford, CM1 3BY

Guinness Global Real Infrastructure (Lux)	FundRock Management Company S.A	By Email: FRMC_qualitycare@fundrock.com
FP WHEB Asset Management Funds	FundRock Partners Limited	By writing to: The Compliance Officer, FundRock Partners Limited, Hamilton Centre, Rodney Way, Chelmsford, CM1 3BY
WHEB Sustainable Impact	FundRock Management Company S.A	By Email: FRMC_qualitycare@fundrock.com
Guinness Ventures Services	Guinness Asset Management	By email: complianceteam@guinnessgi.com By telephone: 020 7042 6573 (Guinness Global Investors customers) 020 7222 3475 (Guinness Ventures customers) Written complaints: Compliance Department Guinness Asset Management 18 Smith Square London SW1P 3HZ

What will we do when we have received your relevant complaint?

We will acknowledge your complaint without delay. In our communication to you we will include a written summary of the Firms internal complaints procedure, along with a copy of this policy and the contact details of the Compliance Officer who will oversee the complaints management process. This information can also be provided on request.

Where appropriate, Guinness reserve the right to refer a complaint to one of its agents if it is deemed that the fault lies with any aspect of the service that they have provided.

Investigating and Resolving a Relevant Complaint

We will investigate a complaint competently, diligently and impartially and will aim to resolve the complaint as soon as possible in a fair and consistent manner. We will keep the complainant informed regarding the progress or of potential delays in investigating the complaint. This will be in writing or by telephone on a recorded line.

Within eight weeks of us receiving a complaint a final response letter will be sent. This will provide a summary of the complaint and will explain in a fair, clear and not misleading way our decision to:

- accept the complaint and, where appropriate, offer redress;
- not accept the complaint, but offer redress; or
- reject the complaint and provide reasons behind this decision.

If we are unable to provide a final response letter within eight weeks, we will send the complainant a written response, explaining the reasons as to why we are unable to provide a final response within the eight-week period and that, if the complainant is an eligible complainant, as defined below, the complaint can be referred to the Financial Ombudsman Service.

Conclusion of Relevant Complaints

We will regard your complaint as concluded in the following circumstances:

- once we have sent you a final response;
- where you have told us in writing that you accept an earlier response that we have sent to you; or
- if you refer your complaint to the FOS, when the FOS informs us in writing that the complaint has been closed.

If you have any questions about this policy or any aspect of our complaints process, please contact us by telephone on 020 7042 6573 or by email to complianceteam@guinnessgi.com

How we will deal with complaints in line with the Consumer Duty

Guinness will consider complaints received from retail customers as part of its ongoing assessment of Consumer Duty outcomes. Complaint trends, root causes and customer outcomes will be monitored and, where appropriate, remedial action will be taken to address identified issues and improve customer outcomes.

This policy was last reviewed in September 2026

Version	Edited by	Date
1.0	Compliance Team	July 2022
2.0	Compliance Team	July 2024
3.0	Julius Bennett	September 2026