

**Guinness Asset Management Ltd (“GAM”)  
Complaints Management Policy**

**Introduction**

Guinness Asset Management (‘GAM’) is authorised and regulated by the Financial Conduct Authority (‘FCA’) in the United Kingdom. We are 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 GAM, 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 GAM, including retail clients of GAM’s EIS and IHT services. In the case of the GAM Dublin based funds and the T. Bailey Guinness UK Fund, where GAM is the delegated sub-adviser, the direct client of GAM is the manager of those funds.

Investors in the GAM Dublin based funds and the T. Bailey Guinness UK Fund should contact the managers of the funds in the first instance, see *Where to Direct a Complaint* below. If a relevant complaint received is from an investor in funds where we are the delegated sub-adviser and the complaint has been referred to us by the manager of the fund/s, we will assist the manager in matters relating to the complaint but the complaints process will be handled by the manager of the funds.

If a relevant complaint is received it is GAM’s 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 ‘FOS’ if you are not satisfied with the way we have handled your complaint.

**Where to direct a complaint**

Investors, or potential investors, in the Guinness Asset Management Dublin based funds should contact the manager of the funds, Link Fund Manager Solutions (Ireland) Limited, in the first instance, using the contact details below:

CFMI\_Oversight@linkgroup.ie.

Investors, or potential investors, in the T. Bailey Guinness UK Funds should contact the manager of the fund, T. Bailey Fund Services, in the first instance, using the contact details below:

Marcus Hand  
Compliance Director  
0115 988 8210  
marcus.hand@tbailey.co.uk

Investors, or potential investors, in the Guinness EIS and IHT Services should contact Guinness Asset Management, using the contact details below.

### **How can you make a complaint?**

Complaints can be made by any reasonable means. For example by letter, fax, email, telephone or in person. Written complaints can be sent to us at the address above. Telephone complaints can be made to 020 7042 6573. A complaint via email should be sent to [info@guinnessfunds.com](mailto:info@guinnessfunds.com)

### **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 performs the complaints management function (“CMF”) and who will oversee the complaints management process. This information can also be provided on request.

Where appropriate, GAM reserves 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 provided 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.

## 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](mailto:complaint.info@financial-ombudsman.org.uk)

**Website:** [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

## Conclusion of Relevant Complaints

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

- once we have send 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 [compliance.team@guinnessfunds.com](mailto:compliance.team@guinnessfunds.com)

This policy was last reviewed in October 2021.