

February 2021

INSTITUTIONAL COMPLAINT HANDLING POLICY

THE PURPOSE OF THIS DOCUMENT IS TO OUTLINE THE COMPLAINT HANDLING POLICY FOR INSTITUTIONAL INVESTORS WHO CONTRACT WITH THE BELOW LEGAL ENTITIES:

- INSIGHT INVESTMENT MANAGEMENT (GLOBAL) LIMITED (IIMG)
- INSIGHT INVESTMENT INTERNATIONAL LIMITED (IIIL)

WHAT IS A COMPLAINT

A complaint is any written or verbal expression of dissatisfaction by a customer, whether justified or not about the provision of or failure to provide a financial service or a redress determination which:

1. alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
2. relates to an Insight activity, or any other person with whom we have some connection in marketing or providing financial services or products, which come under the jurisdiction of the Financial Ombudsman Service.

HOW TO COMPLAIN

Insight Investment deals with all complaints following a written procedure as required by the Financial Conduct Authority rules.

Complaints can be addressed to the Chief Compliance Officer of the Manager at its registered address. A copy of the Manager's complaints handling procedure is available on request.

Complaints should be addressed to:

Insight Investment
The Bank of New York Mellon Centre
160 Queen Victoria Street
London
EC4V 4LA

INVESTIGATION OF COMPLAINTS

Our commitment to you:

- We aim to respond to all complaints in a prompt, consistent and fair manner.
- Your complaint will be recorded and investigated by a suitably trained representative who was not directly involved in the matter that is the subject of your complaint. The member of staff will either have the authority to settle your complaint or will have ready access to someone who has such authority.
- If we are unable to resolve your complaint within four weeks of receipt, we will contact you to explain why we are not in a position to resolve your complaint and give you an indication of when we will make further contact.

- In the unlikely event that your complaint has not been resolved within eight weeks of original receipt, we will send you a letter explaining why we have still not resolved your complaint, indicate when we expect to be able to provide a final response and enclose a copy of the Financial Ombudsman Services explanatory leaflet.
- If we write to you and advise that a response is required from you, if we do not hear from you by the end of the 8th week after our most recent letter, we will close our file.
- On conclusion of our investigation we will write to you with our final response in which we will advise of our findings and, where appropriate, what action is being taken to resolve the matter. We will address the subject matter of your complaint, and where the complaint is upheld, we will offer a resolution that is consistent with treating all of our customers fairly.

FURTHER COURSE OF ACTION – YOUR RIGHTS

- If, after a process of discussion, we are unable to come to a satisfactory conclusion and you are unhappy with the response we provided, you may be eligible to refer your complaint directly to the Financial Ombudsman Service.
- You may also refer the complaint directly to the Financial Ombudsman Service if we have failed to provide you with an adequate response within the eight week period detailed above, and you are dissatisfied with the delay in dealing with your complaint.
- If you decide to refer your complaint to the Financial Ombudsman Service (see contact details below), you must do this within six months of the date we issue our final response to you. After this time the Ombudsman may refuse to consider the matter.

Address: The Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Email: complaint.info@financial-ombudsman.org.uk

Helpline tel: 0800 023 4567

Website: financial-ombudsman.org.uk

GENERAL

We are authorised and regulated by the Financial Conduct Authority (FCA), who have set out specific rules for the handling of complaints. Our procedure is compliant with the FCA rules but if you wish to obtain further information you can contact the FCA as follows:

FCA Consumer Helpline: 0800 111 6768 (Freephone)
From abroad: +44 20 7066 1000
Email: consumer.queries@fca.org.uk
Website: <https://www.fca.org.uk/>

FIND OUT MORE

Institutional Business Development

businessdevelopment@insightinvestment.com
+44 20 7321 1552

European Business Development

europe@insightinvestment.com
+49 69 12014 2650
+44 20 7321 1928

Consultant Relationship Management

consultantrelations@insightinvestment.com
+44 20 7321 1023

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