

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 the Guinness Global Investors Dublin based funds and the Waystone Guinness UK Funds 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. 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 Man Co or AFM.

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

Where to direct a complaint

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

Guinness Global Investors Dublin based funds

Waystone Management Company (IE) Limited

By email: complianceeurope@waystone.com

Waystone Guinness UK Funds:

Waystone Management (UK) Limited

Manda McConnell

By telephone: +44 2039972460

By email: iss-compliance.complaintsteam@linkgroup.co.uk

Guinness Ventures EIS, AIM EIS, VCT or IHT Services

Please contact our Compliance department, using the details set out below:

How can you make a complaint?

Complaints to us can be made by any reasonable means.

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

To ensure that the firm meets its obligations under the Consumer Duty, we will consider the consumer support outcome for all complaints, when considering the merits of any customer complaints about the firm's service. If we receive complaints from customers that suggest we are not delivering on the consumer support outcomes under the Consumer Duty, namely, acting in good faith towards our retail customers, avoiding foreseeable harm to our retail customers and enabling and supporting our retail customers to pursue their financial objectives, we will focus on responding and proactively addressing the concerns.

This policy was last reviewed in March 2024