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July 2022

Mercer Global Investments Europe limited

Complaints Handling Policy

INTRODUCTION

Mercer Global Investments Europe Limited (“MGIE”) has adopted this Complaints Handling Policy (“Policy”) to ensure the prompt handling of clients' or potential clients' complaints. The MGIE Board of Directors is ultimately responsible to approve any update to this Policy

SCOPE

The Policy applies to all complaints received by MGIE and its employees. This includes complaints received directly or indirectly in relation to the funds for which MGIE has been appointed as investment manager and global distributor by Mercer Global Investments Management Limited (“MGIM”) and any other third party.

REGULATORY REFERENCES

Internal use only

This document supersedes and replaces any previous Mercer documents on this subject. Mercer reserves the right to modify, suspend or terminate this document at any time.

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- MiFID II Directive: Directive 2014/56/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments.
- MiFID II Implementing Regulation: Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms.
- Joint Committee Guidelines: Joint Committee Final Report on guidelines for complaints-handling for the securities (ESMA) and banking (EBA) sectors – 27 May 2014.

DEFINITIONS

For the purpose of this Policy, in line with the Joint Committee Guidelines, a “Complaint” is *“a statement of dissatisfaction addressed to MGIE by a natural or legal person relating to the provision of an investment service provided under MiFID, the UCITS Directive or the AIFMD or a service of collective portfolio management under the UCITS Directive.”*

A “Complainant” is defined as *“a natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.”*

POLICY

It is Mercer’s policy to assess all complaints fairly and promptly and to take appropriate remedial measures on the basis of such assessment. A designated complaints management function has been established which is responsible for the investigation of complaints and for maintaining the MGIE Complaints Log which is a log of all complaints received and the measures taken for their resolution. Clients and potential clients may submit complaints free of charge.

Upon receipt of a complaint, the Mercer employee who received the Complaint will immediately report the complaint to the complaints management function. Where an oral complaint is received, it will be documented in a file note recorded on the complaints register and dealt with in the same manner as a written complaint. Upon notification of the complaint, the complaints management function will:

1. Verify that the Complaint meets the definition stated in this Policy;
2. Initiate a full investigation into the matter;
3. Promptly report and/or escalate material concerns, or potential material concerns, to Senior Management and Legal & Compliance;

4. Ensure that this Policy is adhered to including 'Interaction with complainant' as set out below;
5. Ensure a copy of the complaint with all background information and documentation is maintained; and
6. Ensure that each stage of the process is documented and maintained.

INTERACTION WITH COMPLAINANT

1. All complaints, regardless of how they are received, will be acknowledged by MGIE, by issuing a letter or email to the complainant within 5 business days of the Complaint being received. This will include details of the MGIE employee who is the point of contact in relation to the Complaint until the Complaint is resolved or cannot be processed any further.
2. While the investigation of a complaint is ongoing, MGIE will provide the complainant with a regular update of the status of the investigation by letter or email at intervals of not greater than 20 business days starting from the date on which the complaint was received. All communications will be clear, in plain language and easy to understand.
3. MGIE will endeavour to investigate and resolve complaints as early as possible or within 40 business days of having received the complaint. Where the 40 business days have elapsed and the complaint is not resolved, MGIE will inform the complainant:
 - A. of the anticipated timeframe within which MGIE hope to resolve the complaint; and
 - B. that they may be able to refer the complaint to an alternative dispute resolution entity or that the client/ complainant may be able to take civil action.
4. Once the complaint is fully closed and remediated, MGIE will notify the complainant by letter or email of the outcome of the investigation, action taken and remediation within 5 business days of complaint being closed and remediated. This should include, where applicable, the terms of any offer or settlement being made.

Any questions regarding this Policy should be addressed to the MGIE complaints handling function using the following details:

- **Post:** Complaints Management Function (MGIE), Charlemont Street, Dublin 2
- **Email:** DS.ClientSupport@mercero.com

All complaints will be treated as strictly confidential.

COMPLIANCE ASSESSMENT

The Compliance Department will monitor the operations of the complaints-handling process and consider complaints as a source of relevant information in the context of its general monitoring responsibilities. Such monitoring will include an analysis of complaints and complaints-handling data to identify and address any risks or issues.

The Compliance Department will report to the Board Risk Committee, on at least an annual basis, on the implementation and effectiveness of the complaints handling process including any remedies undertaken or to be undertaken.

POLICY REVIEW AND APPROVAL

This Policy was prepared by the Compliance Department in conjunction with the complaints management function and will be reviewed on at least an annual basis. Any amendments will be approved by the Board of Directors.

RECORD RETENTION

All documentation subject to this Policy will be retained in a durable medium for at least seven years.

POLICY ADMINISTRATION

Procedure Review Cycle: Annual

Location: G:\Eworking\MGI\Risk & Compliance (CPS)\Policies & Procedures\Complaints

Version Control:

Version	Prepared by	Reviewed By	Approved by	Effective date
Version 1.0	Compliance and Complaints Handling	Eamonn Liddy	Board	January 2020

Version 1.1	Compliance & Compliance Management Function	Complaints Management Function	Reviewed & no changes required	2021
Version 2	Compliance & Complaints Management Function	Complaints Management Function	Board	August 2022