

# Mercer Global Investments Management Limited

## Complaints Handling Policy

17 Sep 2021

### Introduction

Mercer Global Investments Management Limited (“**MGIM**” and the “**Company**”) was incorporated in Ireland on 8 March 2006. The Company is authorised by the Central Bank of Ireland as an Alternative Investment Fund Manager (AIFM) under Part 2 of the AIFM Regulations<sup>1</sup> and a UCITS Management Company under Part 4 of the UCITS Regulations. As such, the Company manages both UCITS funds (“**UCITS**”) and Alternative Investment Funds (“**AIFs**”) (collectively the “**Mercer Funds**”).

To ensure the prompt handling of clients' or potential clients' complaints and in line with the Company's regulatory and legal obligations, the Board of Directors (the “**Board**”) has adopted the following Complaints Handling Policy (the “**Policy**”).

### Policy Statement

The purpose of the Policy is to outline the Company's complaint handling process as it applies to the Company, those Service Providers to whom the Company has delegated functions and in respect of Mercer Funds. The Company has appointed Mercer Global Investments Europe Limited as Investment Manager and Global Distributor of the Mercer Funds and has appointed State Street Fund Services Ireland Limited as Fund Administrator.

A complaint for the purpose of the Policy is defined as an oral or written expression of dissatisfaction by, or on behalf of, an investor regarding the products or services provided by, or the conduct of, the Company, its delegates or its employees.

### Procedure

A complainant may file/address his/her complaint directly at the registered office of the Company. However, a complainant may also approach a Director or officer of the Company, or in the case of complaints relating to Mercer Funds, the complainant may approach a delegate of the fund, such as the Investment Manager / Global Distributor or the Administrator's shareholder services team, to lodge a complaint.

The Company requires that all complaints received, either in relation to the Company or the Funds under management, are reported to the Board, logged and resolved accordingly by the relevant delegate. Mercer Global Investments Europe Limited, as Global Distributor of the Mercer Funds, is responsible for managing investor complaints in accordance with its Complaints Handling Policy.

The Board has put in place arrangements for handling complaints to ensure that complaints from investors are addressed promptly and effectively. The Designated Person with responsibility for Distribution will, *inter alia*, ensure all investor complaints received will be handled in line with this complaints procedure and the Investment Manager/Global

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Distributor’s Complaints Handling Policy. All complaints received must also be notified to the Company’s Head of Compliance.

All investor complaints will be dealt with promptly and acknowledged within 5 days of receipt. If the complaint is not resolved within the relevant period, a further update will be provided to the client within 20 business days and again within 40 business days after the date of receipt of the complaint. Within 5 business days of completing the investigation of a Complaint, the Complainant will be notified by letter or email of the outcome of the investigation. This should include, where applicable, the terms of any offer or settlement being made.

All complaints received, including the history and outcomes shall be reported to the Board as part of the quarterly report on Distribution. Designated Person(s) will work together and with the relevant delegate to ensure the complaint is resolved appropriately within the required timeframes and that notification to the complainant is undertaken in line with any applicable regulatory requirements. In assessing the nature of the complaint and in the resolution of the matter, the Designated Person(s) will engage with the Fund’s delegates as necessary and escalate any issues in this regard to the Board of the Fund(s) and the Company as appropriate. The Investment Manager/ Distributor/ Administrator shall report details of any complaint received upon receipt and also on a regular basis as part of the on-going reporting to the Designated Persons as specified in the Program of Activity.

**Policy Review and Approval**

This Policy was prepared by the Compliance Department in conjunction with the relevant Designated Persons 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.

**Version Control:**

Version	Prepared by	Reviewed By	Approved by	Effective date
Version 1.0	Compliance	Helen O’Beirne - DP for Distribution	Board	24 Jun 2021
Version 1.1	Compliance	Helen O’Beirne - DP for Distribution	Board	17 Sep 2021