Mercer Limited Complaints Handling Policy

Introduction

Mercer Limited ("Mercer") has adopted this Complaints Handling Policy ("Policy") to ensure the prompt handling of MiFID complaints from clients or potential clients.

Mercer takes complaints very seriously. Should you have reason to complain we have set out the procedures that we will follow. The procedures adopt the requirements and guidance of our regulator, the Financial Conduct Authority (FCA).

Scope

The Policy applies to all MiFID complaints received by Mercer and its employees.

Definitions

For the purpose of this Policy, a MiFID complaint ("Complaint") is any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

A MiFID complaint relates to the provision of investment services or ancillary services to a client by an investment firm.

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. Clients and potential clients may submit complaints free of charge. All Complaints will be treated as strictly confidential and we will communicate clearly with clients or potential clients in plain language. We shall reply to the Complaint without undue delay.

Upon receipt of a MiFID Complaint, we 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;
- 5. Ensure a copy of the Complaint with all background information and documentation is maintained including its resolution.

After we receive a MiFID complaint we will investigate the matter fully, once we have all the necessary information. We will acknowledge its receipt within five working days. If the complaint is made by telephone, our acknowledgement will set out our understanding of the issue(s) to be investigated. This gives a complainant the opportunity to write to us if they feel that we have misunderstood the nature of the complaint, or wish to make further points.

We will keep complainants informed about how the complaint is progressing at all times.

In the unlikely event that we have not fully dealt with a complaint within four weeks of receiving it, we will write to explain what we have done so far and, if possible, state when we expect to send a final decision letter. By the end of eight weeks from the date of receiving a complaint, we will give our final response, or a letter informing that we are still not in a position to make a final response, giving reasons for the further delay and indicating when we expect to be able to issue our final response.

We will also state that an eligible complainant may refer the complaint to the Financial Ombudsman Service (FOS) if they are dissatisfied with the delay, provided the complaint falls within its jurisdiction.

Any questions should be directed to:

Compliance, Mercer Limited, 1 Tower Place West, London, EC3R 5BU. Telephone: 020 7178 3159

The Financial Ombudsman Service (FOS)

- We are covered by the FOS, so you can get in touch with the FOS if you have any complaints which we cannot settle, provided that your complaint falls within its jurisdiction.
- If your complaint falls within its jurisdiction then we will provide details of how to refer your complaint to the FOS.

You can contact the FOS at the following address:

Financial Ombudsman Service Exchange Tower London E14 9SR Telephone: 0300 123 9 123

You can also find more information about the Financial Ombudsman Service on its website:

www.financial-ombudsman.org.uk

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