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1. Introduction

This document details our policy on how we will deal with complaints raised by our clients in relation to the services that we have provided. The requirements in FCA Dispute resolution: Complaints Sourcebook have been used to ensure an appropriate complaint process is in place to manage and address as appropriate your complaint.

This procedure should be used by you if you are a client of the following UK regulated entities, Citco Custody (UK) Limited and Citco Financial Products (London) Limited. It clearly details the processes and timescales that we will follow to ensure that complaints are handled in a timely, thorough and fair manner.

2. How to make a complaint

Complaints and expressions of dissatisfaction can be highlighted to us in a variety of ways either in writing (letter, e-mail) or via a phone call.

Your complaint should be made to your relevant client relationship manager who ordinarily would co-ordinate your compliant response. However if it is more appropriate a complaint can be made either to their line manager or the UK Compliance team.

3. How we will handle your complaint

Complaints will ordinarily be co-ordinated by the relevant client relationship manager, or if required by an independent client relationship manager who has not been involved in the issues that you have complained about.

All complaints should within one working day of the receipt be reported to relevant senior management and also Group Compliance.

We will acknowledge your complaint within three business days¹. This communication to you will include a summary of what we have interpreted the cause of the compliant to be and the name of the person dealing with the complaint. Where possible this communication may also provide details of how we have addressed and closed off the complaint and that we consider the issue to be resolved.

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¹ FCA Dispute resolution: Complaints [DISP 1.5]

If we are unable to investigate and address the complaint within these three days we will confirm that we need to undertake a more detail complaint analysis. In these cases a substantive final written response following a full investigation will be sent to you within 8 weeks² (40 business days).

All correspondence to you will have been agreed by compliance and the investigating manager prior to issue.

Our response will also include a notification to you that you have the right not to accept the outcomes of our review if you believe that we have not investigated the case appropriately. You should notify us in writing within 8 weeks that you do not accept the outcome. We will deem the complaint case to be settled in 8 weeks if no written reply to the contrary is received from you.

Some client types in cases where they are unhappy with our financial response may be able to take up their issues with the UK Financial Ombudsman. You can check if you are an eligible complainant via their website www.financial-ombudsman.org.uk.

² FCA Dispute resolution: Complaints [DISP 1.6.2]