

## **Complaints Handling Policy**

### **Waystone Investment Management (IE) Limited Waystone Fund Management (IE) Limited**

The Designated Person shall monitor the implementation of Waystone Investment Management (IE) Limited and Waystone Fund Management (IE) Limited procedure for the handling of complaints received from Shareholders which is set out below and which is available free of charge to Shareholders on request. The procedure is intended to ensure that any complaints received are dealt with effectively and within an appropriate timeframe. The Board is satisfied the procedure will enable all complaints to be handled promptly and effectively.

Shareholders are entitled to file complaints free of charge. Complaints may be received by the Company directly or by a delegate on behalf of the Company.

Once a potential complaint is received in writing, it will be considered by the relevant delegate and, if confirmed to be a complaint, it will be referred immediately to the Designated Person, who will decide on the response to be given in consultation with the relevant delegate. For example, a complaint will be considered to have been received if it represents a claim that:

- a. an investor deal has been recorded incorrectly, and has not been corrected; or
- b. a loss has been incurred by the Shareholder; or,
- c. an issue previously raised has not been addressed to the satisfaction of the Shareholder.

The Designated Person may decide to first refer the complaint to the Board for consideration. Once the response and any corrective action required has been decided on, the Designated Person will co-ordinate the issue of the response to the Shareholder with the delegate.

If an issue is considered by the relevant delegate not to represent an actual complaint, the delegate will determine the course of action and respond appropriately.

Speed of response will be a priority, but depending on the nature of the complaint, it may take time to investigate and if it is not possible to provide a full response within the time requested in the complaint, receipt of the complaint will be acknowledged within 5 business days. It will be confirmed in the communication that the complaint is being investigated indicating the expected time of response. A full response, or further updates pending complete resolution, will be sent within the time indicated in the initial response. The Company will endeavour to resolve the complaint within 40 business days of first receipt.

All complaints received (whether addressed or in the process of being addressed) shall be reported to the Designated Person on a monthly basis and will also be included in the quarterly Board reports described under section 13.1 “Provision of information on an ongoing basis” above.

The Designated Person will keep a file of complaints received by the Company, including a record of its response and any action taken as a result of the complaint.

All written complaints will receive a written response, and the Shareholder will be advised that it can raise the matter with the Central Bank if not satisfied with the outcome.

### Reports

Complaints report  
Administrator’s report  
Investment Manager’s report  
Depositary’s report  
Report Issuer

### Relevant delegate Information contained in the Report

Complaints report	- Details of any complaint received
Administrator’s report	- Details of all complaints received, if any
Investment Manager’s report	- Details of all complaints received, if any
Depositary’s report	- Details of all complaints received, if any

### Frequency

Complaints report	- Following receipt of a complaint
Administrator’s report	- Monthly
Investment Manager’s report	- Monthly
Depositary’s report	- Monthly

### Circumstances in which an exception report will be required

Circumstances where an exception report will be required include:

a. where a complaint is serious in nature, demands a response by a stated time or a response from the Board, refers to escalating the complaint to the shareholder's advisers or bringing it to the attention of any regulatory body.

Circumstances where action is required

If a non-Material complaint is received, for example that a contract note is incorrect or has been wrongly addressed, the Administrator will re-issue the amended contract note and notify the Designated Person and the Board in due course.

If a Material complaint is received, for example that a redemption has not been properly effected and the Shareholder has incurred a loss, or that a previous complaint has been inadequately addressed, it will first be forwarded to the Designated Person to agree a response with the relevant delegate. The Designated Person will refer the complaint and the draft response to the Board in accordance with escalation procedures agreed with the Board from time to time.

Examples of the action that may be taken in response to a complaint, depending on the circumstances, include compensating a Shareholder for a loss that has been incurred or correcting inaccuracies in the Shareholder register.

Responsibility for determining action to be taken

Delegate, Designated Person or Board, depending on circumstances.

Responsibility for performing action to be taken

Relevant delegate.