

<p>REF: C-09</p> <p>Version.8 July 2017</p>	<h2>Complaints Policy and Procedure</h2>
<p>Responsibility: ALL</p> <p>Related Procedure ALL</p> <p>Related Legislation: Conduct of Business Rules (2016)</p>	<p>A “<i>Complaint</i>” is an oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the firm's provision of, or failure to provide, a service.</p> <p>“<i>Significant Complaint</i>” means a complaint alleging a breach of the Protection of Investors (Bailiwick of Guernsey) Law, 1987, as amended and any Rules or Regulations made there under (the “POI Law”), or a breach of the Regulation of Fiduciaries, Administration Business and Company Directors etc (Bailiwick of Guernsey) Law, 2000, as amended, and any Rules or Regulations made there under (“the Fiduciary Law”), or any other Law of the Bailiwick of Guernsey, mala fides, malpractice or impropriety, or repetition or recurrence of a matter previously complained of (whether significant or otherwise).</p> <p>A complaint shall not be treated as significant if it relates to minor mechanical or clerical error unless such error has resulted in a breach of the POI Law, the Fiduciary Law or any other Guernsey Law.</p> <p><u>Policy</u></p> <p>This policy document has been adopted by CAM. This policy defines the written procedures for the above subject matter.</p> <p>CAM’s Policies and Procedures can be located on the Server.</p> <p>If you have any concerns or queries regarding either this document or the Policies Manual please speak with a Director, MLRO or Nominated Officer.</p> <p><u>Overview</u></p> <p>CAM is licensed by the Guernsey Financial Services Commission (“GFSC”). Licensed firms are required to have in place and to operate effective policies and procedures in order to complete the necessary documentation required in order to meet Regulatory obligations.</p> <p><u>Procedure</u></p> <p>When a complaint is received the first action is to notify the Compliance Officer immediately. The following parties must also be advised and remain involved with the progress of the complaint:</p> <ul style="list-style-type: none"> • The Relevant Administrator • The Relevant Supervisor • The Relevant Director <p>A <u>Complaint Report</u> must be opened, and a copy submitted to Compliance. Where it is unclear whether a complaint is significant or not, the matter should be referred for discussion between the Compliance Officer, the Relevant Director and the Managing Director.</p> <p>Significant complaints need to be notified to the GFSC immediately. Any other complaint that has not been resolved within 3 months also requires GFSC notification. Refer to the MLRO in such instances.</p> <p>CAM will send the complainant a written acknowledgement within three business days providing the complainant with early reassurance that the complaint has been received and is being dealt with. This must advise the complainant that a senior</p>

member of staff has been appointed to investigate the complaint, and that a written response will be received from a Director within a reasonable timeframe.

Wordings used in the “holding response”, must under no circumstances, admit any liability.

CAM will designate a senior member of staff, at Supervisor level or above, to investigate the circumstances surrounding the complaint. That member of staff will, within a reasonable timeframe, compile an initial summary of their findings and discuss these with the Compliance Officer, relevant Director and relevant Administrator.

CAM will issue the Client with a full response to their complaint once the necessary investigations have been completed. If CAM cannot provide the Client with a reasonable timescale, CAM will write to the Client explaining why they are not yet in a position to resolve the complaint and give the Client some indication of when CAM will make further contact.

Closing a Complaint

A complaint will be considered resolved if no further communication is received within 4 weeks from the date of the substantive response sent to the complainant.

Notifications

If a significant complaint remains unsettled for longer than three months, CAM” will inform the GFSC and shall also advise the complainant that he may inform the GFSC directly of his complaint. CAM may inform the GFSC of the complaint before the expiration of the three month period if it feels that it is necessary or desirable so to do.

Where a complaint is significant, notification must be made to CAM insurers, and, in some circumstances, external legal advice obtained. Notification of a potential PI claim must also be made to the GFSC.