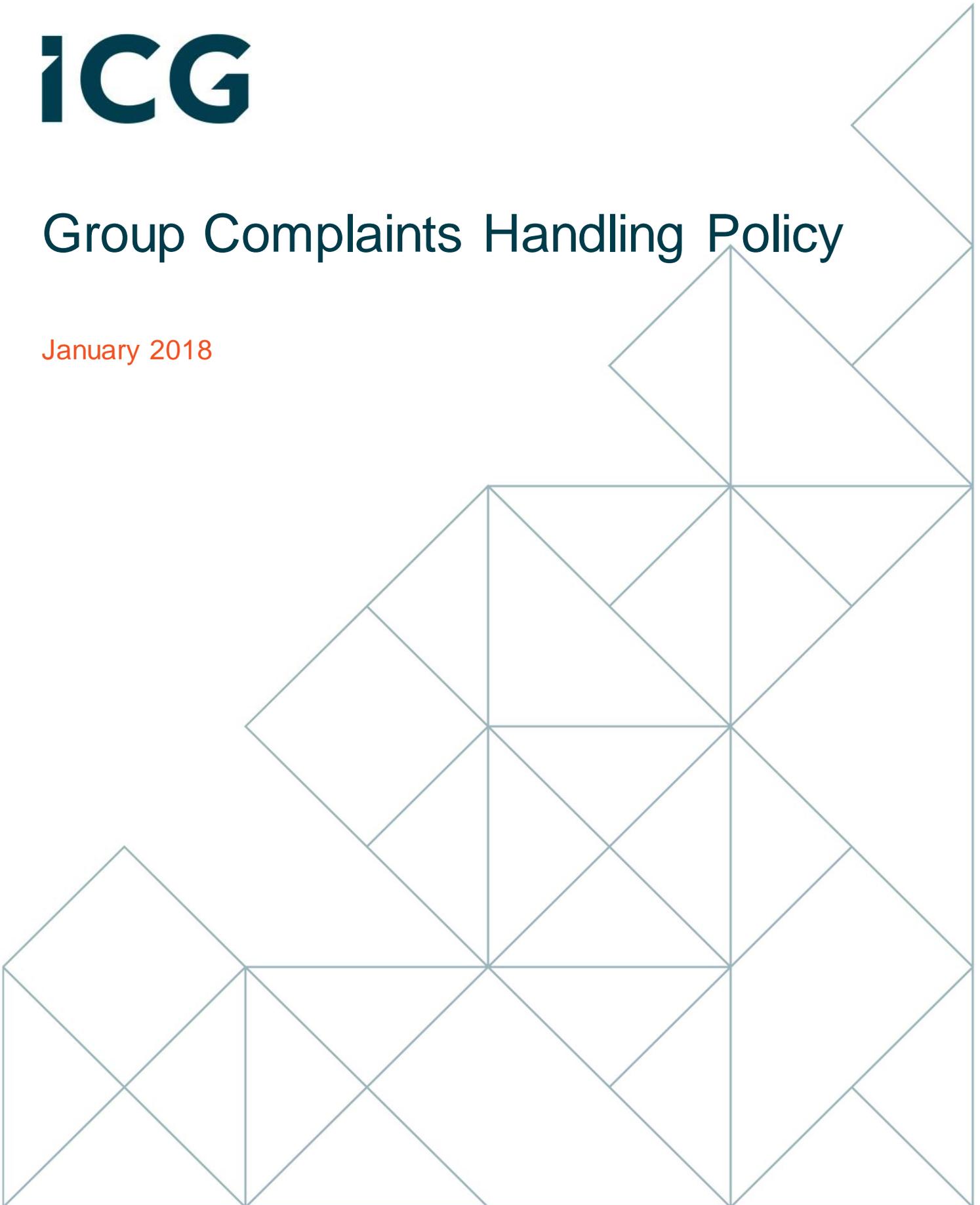




# Group Complaints Handling Policy

January 2018



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## ICG GROUP COMPLAINTS HANDLING PROCESS

### 1. INTRODUCTION

#### COMPLAINTS

- 1.1. A complaint is any oral or written expression of dissatisfaction.
- 1.2. This Complaints Management Policy describes the processes ICG will take in managing complaints from clients or potential clients.
- 1.3. Any complaint we receive from one of the funds, an underlying investor in one of the funds or a segregated (or potential) segregated mandate client (together, "clients") must be reviewed objectively and any complainant treated fairly. Clients must never be charged for the submission of complaints. Compliance has responsibility for handling complaints.

### 2. COMPLAINTS HANDLING PROCESS

- 2.1. Any non-trivial complaint received by ICG from a regulatory client or potential regulatory client will be dealt with immediately in accordance with the following procedures:
  - a) **Compliance:** All complaints must be brought to the attention of Compliance. Upon receipt of a complaint, Compliance must provide a prompt acknowledgement of the complaint, a copy of this Policy and the contact details of Compliance. For these purposes, provide the details of ICG Compliance Officer, Stuart Griffiths at [stuart.griffiths@icgam.com](mailto:stuart.griffiths@icgam.com) or on 0203 201 7752. Compliance will assess whether the complaint is covered by the EU Markets in Financial Instruments Directive or other relevant regulations. If so, it will promptly acknowledge this in writing to the recipient.
  - b) **Who handles the complaint:** Complaints will be investigated by an investigator approved by Compliance, who will investigate the events surrounding the reason for the complaint to identify and address any risks and issues. If the complaint involves material sums for the client, ICG's Chief Executive Officer will investigate the complaint or designate another Managing Director or a Partner to do so. It is the responsibility of the individual investigating the complaint to ensure that the complaint is handled and settled expeditiously. The designated person should not have been personally involved in the matter. ICG will promptly notify the complainant in writing of who is handling their complaint.
  - c) **Investigation:** ICG will seek additional information as necessary when considering the complaint. ICG will keep the complainant informed of progress of the complaint. Compliance must be kept informed of the progress of ICG's interaction with the client in relation to the complaint. It is the investigating person's responsibility to ensure that Compliance is updated.
  - d) **Conclusion:** Once ICG concludes its investigation, a full and clear response must be prepared in writing in plain language and provided to the client without any unnecessary delay, and include details of the client's options. The response will set out whether ICG has upheld the complaint. Where appropriate, the response must include a statement that the

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client may be able to take civil action and/or that the complaint was covered by rules made under the EU Markets in Financial Instruments Directive.

- e) **Upheld complaints:** Where ICG upholds a complaint it will assess whether remedial action or redress (or both) are appropriate and whether there are reasonable grounds to conclude another person is solely or jointly responsible (in which case ICG may contact that person to discuss the complaint). Where the complainant accepts an offer of redress or remedial action, ICG will promptly comply.
  - f) **Escalation:** If the complaint cannot be settled to the client's satisfaction, assistance should be sought from ICG's General Counsel.
  - g) **Financial Ombudsman Service:** ICG's regulatory clients are limited to professional clients and eligible counterparties and are not eligible to appeal to the UK Financial Ombudsman Service.
- 2.2. Details of our complaints handling process will be published on ICG's website and copies will be provided to clients upon request. ICG does not charge for responding to a complaint in accordance with the above procedure.