

## Complaints Handling Policy

This policy is applicable to all customers of Architas Multi-Manager Europe Limited (hereafter “AMMEL”). AMMEL will consistently deliver fair outcomes in line with the requirements outlined by Chapter 10 of the Consumer protection Code and the UCITS Regulations.

The Policy and associated procedures of the Manager require that AMMEL:

- treats complaints fairly.
- carries out appropriate root cause analysis to understand fully the reasons as to why complaints have occurred and may be reoccurring.
- takes appropriate remedial action in response to complaints and thereby reduce the number of complaints in the future.
- complies with the UCITS Regulations / the Consumer Protection Code/ MiFID regulations in relation to complaints handling.

The Consumer Protection Code Chapter 12 defines a complaint as follows:

“*complaint*” refers to an expression of grievance or dissatisfaction by a consumer, either orally or in writing, in connection with:

- a) the provision or the offer of the provision of a product or service to a consumer by a regulated entity; or
- b) the failure or refusal of a regulated entity to provide a product or service to a consumer;”

Therefore, AMMEL might expect to receive complaints in the following format:

- A written letter from a fund unit holder/ investor expressing dissatisfaction. This would automatically be deemed a complaint.
- Dissatisfaction expressed on the telephone. AMMEL may seek to resolve the complaint during the telephone call, in accordance with this Policy

In this context, complainants can therefore email their complaint: **[select.ireland.fundoversight@axa-im.com](mailto:select.ireland.fundoversight@axa-im.com)**

Alternatively, clients can write to: **Complaints / Compliance Officer, Architas Multi-Manager Europe Limited, Wolfe Tone House, Wolfe Tone Street, Dublin 1**

### Upon receiving a complaint

When receiving an oral complaint, AMMEL must offer the consumer the opportunity to have this handled in accordance with the Company’s complaints process.

On receipt of a complaint and in accordance with the Consumer Protection Code, the Company must:

- a) acknowledge each complaint on paper or on another durable medium within five business days of the complaint being received;
- b) provide the complainant with the name of one or more individuals appointed by AMMEL to be the complainant’s point of contact in relation to the complaint until the complaint is resolved or cannot be progressed any further;
- c) provide the complainant with a regular update, on paper or on another durable medium, on the progress of the investigation of the complaint at intervals of not greater than 20 business days, starting from the date on which the complaint was made;
- d) attempt to investigate and resolve a complaint within 40 business days of having received the complaint; where the 40 business days have elapsed and the complaint is not resolved, the regulated entity must inform the complainant of the anticipated timeframe within which the regulated entity hopes to resolve the complaint and must inform the consumer that they can refer the matter to the *Financial Services and Pensions Ombudsman (hereafter “FSPO”)*, and must provide the consumer with the contact details of the FSPO; and
- e) within five business days of the completion of the investigation, advise the consumer on paper or on another durable medium of:
  - i) the outcome of the investigation;
  - ii) where applicable, the terms of any offer or settlement being made;
  - iii) that the consumer can refer the matter to the FSPO;
  - iv) the contact details of the FSPO.

The Company may also forward the complaint to another respondent firm, who may be solely or jointly responsible for the matter alleged in a complaint, or a relevant part of it.

**Responding to a complaint**

When handling a complaint, AMMEL will communicate with clients or potential clients clearly, in plain language that is easy to understand and shall reply to the complaint without undue delay.

AMMEL will communicate the firm's position on the complaint to clients or potential clients and inform the clients or potential clients about their options, including that they may be able to refer the complaint to the FSPO, or that the client may be able to take civil action. Details regarding the FSPO must be set out clearly, comprehensibly, in an easily accessible way and prominently within the complaint response. Where the complaint is from a consumer, the Company and the DP for Regulatory Compliance must adjudicate on the complaint.

The Company will also communicate the following in their response (when responding to a complaint within three business days of receipt):

- refer to the fact that the complainant has made a complaint and inform the complainant that AMMEL now considers the complaint to have been resolved;
- inform the complainant that if, still dissatisfied with the resolution of the complaint, the complainant may be able to refer it to the FSPO; and
- provide the contact details of the FSPO: Lincoln House, Lincoln Place, Dublin 2, D02 VH29 / by email [info@fspo.ie](mailto:info@fspo.ie) / by phone +353 1 567 7000. Further details are available on the FSPO's website: [www.fspo.ie](http://www.fspo.ie).