

CQS Complaints Policy

Executive Summary

This policy is a key part of ensuring that our Clients (including for this purpose investors in the Funds we manage) are treated fairly. It sets out our commitment to ensure that any complaints received are dealt with in a timely and transparent manner. If you receive any communication from a Client or an Investor in one of our Funds which might reasonably be viewed as a complaint you should contact Compliance immediately.

Scope and Purpose

CQS (UK) LLP, CQS (Hong Kong) Limited, CQS (US), LLC and any other group company from time to time (together “**CQS**”) are committed to ensuring that complaints are appropriately addressed and resolved. This commitment means that CQS will take all reasonable steps to manage complaints in a prompt and fair manner.

This Policy principally applies to CQS in the UK and separate complaints processes exist for CQS (US), LLC and CQS (Hong Kong) Limited. However, subject to local regulatory requirements, CQS seeks to deal with any complaints in a consistent manner across the Group.

All partners, employees, officers and agents of CQS and its sub-contractors or delegates (“**Staff**”) should be aware of this Policy and comply with it at all times. It is unacceptable for Staff to act, or encourage others to act, in a way to deliberately seek to circumvent the intention of the rules set out by CQS in this Policy.

This Policy is applicable to those funds (whether they are classified as AIFs, UCITS, or otherwise) managed by CQS (“**Funds**”) and the investors in these Funds or clients who have given us bespoke mandates under which CQS provides investment management services (together, “**Clients**” and “**Complainants**”). Where a Complainant falls within the FCA Handbook definition of “**Eligible Complainant**” (or as otherwise may be stipulated by the FCA Handbook) then there are regulatory timeframes to be adhered to by CQS in addressing the complaint.

An Eligible Complainant does not include eligible counterparties or professional clients (including those opted up to professional classification) unless they also qualify as a “**Consumer**”. A Consumer for these purposes is any individual acting for purposes which are wholly or mainly outside that individual’s trade, business, craft or profession. So, whereas investors in CQS Funds may be categorised as professional clients, they may also be categorised as Consumers and therefore an Eligible Complainant.

How a Client makes a Complaint

A complaint is an oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a Complainant about the provision of, or failure to provide, a financial service or a redress determination, and which:

- a) alleges that the Complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- b) relates to an act or failure to act on the part of CQS.

If a Complainant has a complaint relating to CQS, this complaint should be communicated to the Global Head of Compliance who also acts as the CQS Complaints Officer. This communication may be made:

- by post at CQS’ UK office address;
- by email to compliance@cqsm.com; or
- by phone on 020 7201 6900.

In the event that you receive any communication from a Client that you consider may constitute a complaint, please forward to the Global Head of Compliance immediately.

Handling a Complaint

On receipt of a potential complaint, the CQS Complaints Officer will promptly commence an investigation, initially to assess whether this is a formal complaint or not and whether the Complainant is an Eligible Complainant or not. Where the CQS Complaints Officer is satisfied that this warrants treatment as a formal complaint, CQS will commence a formal investigation into the matter. CQS shall investigate the complaint competently, diligently and impartially in order to assess the reason for the complaint and the appropriate course of action to be taken in relation to the complaint.

We will acknowledge the complaint in writing in a timely manner and without any unnecessary delay. We will also notify the Complainant of the person handling the complaint as part of the acknowledgement. CQS will aim to resolve complaints at the earliest possible opportunity.

During the investigation of the complaint, CQS Complaints Officer will regularly update the Complainant in writing on the progress of the investigation.

CQS will seek to handle all complaints in accordance with the following four principles:

- transparency of the review process for the Complainant;
- no additional costs or fees will be incurred by the Complainant as a result of their complaint;
- objectivity of any investigation of the complaint; and
- timely communication with the Complainant.

Following the conclusion of our investigation, we will provide a written response to the Complainant, notifying them of the outcome of the investigation and the actions proposed to resolve the complaint.

Formal Resolution

Where a complaint has not been capable of immediate redress then within eight weeks, CQS will send the Complainant a final written response. This response may include:

- acceptance of the complaint and, where appropriate, an offer of redress or remedial action; or
- an offer of redress or remedial action without accepting the complaint; or
- rejection of the complaint and the reasons for doing so; or
- an explanation as to why CQS is not in a position to make a final response and indication of when CQS expects to be able to provide one.

In each response to an Eligible Complainant, we will also provide, in so far as relevant:

- a copy of the Financial Ombudsman Service's ("FOS") standard explanatory leaflet;
- the FOS website address;
- information that if the Eligible Complainant remains dissatisfied with CQS' response, the complaint can be referred to FOS and the relevant applicable time limits; and
- whether CQS consents to waive the time limits relating to the referral of the complaint to the FOS, if applicable.

The Financial Ombudsman Service

As CQS is authorised and regulated by the Financial Conduct Authority ("**FCA**") it falls under the "Compulsory Jurisdiction" of FOS in relation to Eligible Complainants.

Those Eligible Complainants who have made a complaint to CQS shall be informed of their rights in relation to the FOS as part of CQS' final response to this complaint.

If an Eligible Complainant remains dissatisfied, they are entitled to refer the complaint to the FOS within six months following their receipt of the final written response.

Access to Collective Redress Mechanisms

In the UK, individual consumers cannot bring a collective claim themselves but may do so via a designated public authority or private body authorised by the Secretary of State. A number of EU member states have their own individual representative action mechanisms and by the end of 2022 all Member States are required to have translated the Collective Redress Directive into their national law and implement an effective procedural mechanism that will allow “qualified entities” to commence representative lawsuits on behalf of consumers.

Reporting

CQS shall report to the FCA twice a year the number of complaints received from Eligible Complainants in that half yearly period in the event of any complaints being received. Only complaints that have been through the formal process during the period shall be reported. Reports shall be submitted in the form prescribed by the FCA and sent through the FCA’s GABRIEL system.

Record Keeping

CQS shall record all complaints from Eligible Complainants whether resolved informally or formally in the Complaints Log. These records will be kept for a period of not less than seven years.

Governance

CQS has established a Regulatory Oversight and Conflicts Committee (“ROCC”) which meets at least quarterly. ROCC consists of representatives from the control functions (Risk, Compliance and Legal) as well as investment management functions. ROCC will evaluate any recent complaints from Eligible Complainants and the way in which they were handled and resolved. ROCC will also assess the complaints log data to identify any trends or potential improvements needed, and may choose to report on its assessment to the Executive Committee in the event of any material issues being raised.

Policy Review

This Policy is subject to review not less than once a year by Compliance. Any material changes will be presented to ROCC for approval.