

Manulife | CQS Complaints Policy

Scope and Purpose

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.

CQS (UK) LLP and CQS (US), LLC (together “**Manulife | CQS**”) are committed to ensuring that complaints are appropriately addressed and resolved. This commitment means that Manulife | CQS will take all reasonable steps to manage complaints in a prompt and fair manner.

This Policy principally applies to Manulife | CQS in the UK and a separate complaints process exists for CQS (US), LLC. However, subject to local regulatory requirements, Manulife | CQS seeks to deal with any complaints in a consistent manner.

All partners, employees, officers and agents of Manulife | 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 Manulife | CQS in this Policy.

This Policy is applicable to those funds (whether they are classified as AIFs, UCITS, or otherwise) managed by Manulife | CQS (“**Funds**”) and the investors in these Funds or clients who have given us bespoke mandates under which Manulife | 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 Manulife | 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 Manulife | CQS Funds may be categorised as professional clients, they may also be categorised as Consumers and therefore an Eligible Complainant.

Note – this policy does not directly apply to investors in the New City suite of funds. There are separate and less stringent rules applying to listed unit trusts. Complainants in respect of any of the New City funds do not have access to the Financial Ombudsman’s Service (“**FOS**”). Complaints made to representatives of the New City funds, including its appointed brokers, must notified to Compliance in good time following the receipt of the complaint. Compliance should record this in the Complaints Register, including the results of any such complaints process. However, the policy as written below shall apply in spirit but not letter.

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 Manulife | CQS.

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

- by post at Manulife | CQS’ UK office address: 4th Floor, One Strand, London, WC2N 5HR;
- by email to compliance@cqsm.com; or
- by phone on 020 7201 6900.

In the event that any member of Staff receives any communication from a Client that may constitute a complaint, it should be forwarded to the Head of Legal and Compliance immediately.

Handling a Complaint

On receipt of a potential complaint, the Manulife | 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 Manulife | CQS Complaints Officer is satisfied that this warrants treatment as a formal complaint, Manulife | CQS will commence a formal investigation into the matter. Manulife | 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. Manulife | CQS will aim to resolve complaints at the earliest possible opportunity.

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

Manulife | 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, Manulife | 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;
- an offer of redress or remedial action without accepting the complaint;
- rejection of the complaint and the reasons for doing so; or
- an explanation as to why Manulife | CQS is not in a position to make a final response and an indication of when Manulife | 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 standard explanatory leaflet;
- the FOS website address;
- information that if the Eligible Complainant remains dissatisfied with Manulife | CQS' response, the complaint can be referred to FOS and the relevant applicable time limits; and
- whether Manulife | CQS consents to waive the time limits relating to the referral of the complaint to the FOS, if applicable.

The Financial Ombudsman Service

As Manulife | 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 Manulife | CQS shall be informed of their rights in relation to the FOS as part of Manulife | 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.

Reporting

Manulife | CQS shall report to the FCA in the form and with the frequency required. Only complaints that have been through the formal process during the period shall be reported.

Record Keeping

Manulife | 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

Manulife | CQS has established an Operating Committee (“**OpCo**”). OpCo will evaluate any recent complaints from Eligible Complainants and the way in which they were handled and resolved.

Policy Review

This Policy is subject to periodic review. Any material changes will be presented to OpCo for approval.

Policy Information

Maintenance, Authorisation, and Review Requirements

Department responsible	Legal and Compliance
Individual responsible (policy owner)	Head of Legal and Compliance
Ordinary frequency of update/review	Annual
Distribution	External - Website
Entity applicability	CQS (UK) LLP and CQS (US) LLC

Update and Review Information

Last updated	August 2024
Updated by	Head of Compliance