

Complaints

A complaint is any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of, a Client regarding the provision of, or failure to provide, a financial service.

Virtus International Management LLP (“Virtus”) operates to the highest possible standards, and we aim to provide the very best service to our customers. In the event of those standards (or your expectations) not being met, then our complaints procedure acts as a fallback option.

All complaints received from a person, or clients (potential, current or previous) will be reviewed objectively, and any complainant treated fairly and promptly. Virtus takes all complaints seriously and the summary below outlines the steps Virtus will take in managing complaints from potential, actual or former Clients.

Contact

The Global Chief Compliance Officer at Virtus is responsible for the management and oversight of complaints at 48 Dover St, London, W1S 4FF, United Kingdom. You may make your complaint for their attention by letter to Virtus. Alternatively, you may submit the complaint verbally by contacting Virtus on +44 20 3205 4100, or via email to London@virtus.com.

You do not need to make the complaint in writing, but it would help our investigation if you could set all the details clearly in your communication. These details include:

- Your name, address and, where applicable, your account number
- The specific details regarding your complaint, including any relevant dates where applicable
- The suggested course of action that you would like us to undertake to correct this
- Any relevant documents that support your complaint

Virtus does not charge a complaint-handling fee as this process is free of charge.

Acknowledging your complaint

Virtus will promptly acknowledge your complaint in writing within 3 business days. In this acknowledgement, Virtus will endeavour to provide early reassurance that the complaint has been acknowledged and that we are investigating the matter by providing the name and title of the person within Virtus who will handle your complaint. This individual will have the authority necessary to investigate the complaint and will be independent of the circumstances of the complaint.

Investigating complaints

Your complaint will be investigated by the individual identified in the acknowledgement Virtus will send to you, in a competent, diligent and impartial manner, where the history of your account and the events that have occurred resulting in your dissatisfaction will be thoroughly reviewed. Certain telephone lines

within Virtus are recorded and may be used to assist in the investigation of any complaints. Virtus will keep you informed of the progress of the complaint.

Although we will endeavour to reply to you with the outcome of our investigation at the earliest possible opportunity, there may sometimes be a scenario where the investigation can take longer. We will keep you updated on progress whilst the complaint is investigated further.

Resolving Complaints

The FCA rules set out a final response time of eight weeks following the receipt of the complaint. Once Virtus has concluded its investigation, a full and clear response will be provided to you without any unnecessary delay, providing comprehensive details of your options. The response will set out whether Virtus has upheld the complaint and whether remedial or redress (or both) are appropriate. When you accept an offer or redress or remedial action, Virtus will promptly comply.

In the unlikely event that your complaint cannot be resolved within eight weeks of receipt, we will send you a letter explaining why that is, along with a timeframe of when we will provide further information. We will also provide details of your right to escalate the complaint to the Financial Ombudsman Service.

After a complete and thorough investigation, if we determine that the fault lies with us, then we will agree a resolution with you. If we do not believe we are at fault, we will explain in detail the reasons why.

Record Keeping

Virtus is required to keep detailed records of all complaints and the measures taken to resolve them. Such records will be retained for 5 years from the date of resolution of the complaint.

Financial Ombudsman Service

If you remain dissatisfied with the outcome of your complaint, or we take longer than the designated 8 weeks to resolve it, then you can refer your complaint to the Financial Ombudsman Service

This is a free and independent service that settles complaints between customers and businesses. They will investigate your complaint and work with us to resolve it fairly and impartially.

The timeframe for referral after our final resolution letter is 6 months.

Please contact them by using either telephone (0800 023 4567) or email (complaint.info@financial-ombudsman.org.uk), with further details being available at www.financial-ombudsman.org.uk.