



Genesis Investment Management, LLP
21 Grosvenor Place
London SW1X 7HU
Telephone: +44 (0)20 7201 7200
www.giml.co.uk

Complaints Policy

Introduction

Genesis Investment Management, LLP (“GIM”) aims to ensure that customers are treated fairly at all times. Any complaint received is investigated diligently and impartially, assessing fairly and promptly the subject matter of the complaint, whether the complaint should be upheld and what remedial action or redress may be appropriate. GIM will have regard to the rules of the UK Financial Conduct Authority (“FCA”) when dealing with complaints. Genesis will also have regard to its general fiduciary obligations as set out by the U.S. Securities and Exchange Commission.

The FCA’s Dispute Resolution handbook sets out the rules relating to the handling of complaints from eligible complainants and MiFID clients. GIM has determined that it has no eligible complainants under the FCA’s rules in this area and, as such, it is exempt.

GIM carries out MiFID business in relation to professional clients only as defined by the FCA. Professional clients do not come under the jurisdiction of the UK Financial Services Ombudsman (“FOS”), however clients and potential clients may submit MiFID complaints, the resolution of which will be governed by this policy.

A “MiFID complaint” is defined as “any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination which alleges that the complainant has suffered or may suffer financial loss, material distress or material inconvenience”.

The GFSC definition of a complaint is broadly the same. The GFSC goes further to define a “significant complaint” as “a complaint alleging a breach of the law, *mala fides*, malpractice or impropriety, or repetition or recurrence of a matter previously complained of (whether significant or otherwise)”.

This policy is available on GIM’s website. GIM is required to enable complaints to be submitted free of charge.

Complaints Process

Complaints might relate to any person employed by GIM or any aspect of GIM’s activities. GIM’s Client Team are responsible for receiving complaints, which are then reported to GIM’s Legal, Compliance and Risk (“LCR”) Department. The LCR Department will determine the appropriate action for dealing with the complaint. All complaints are recorded regardless of triviality.

On receipt of a complaint, the Client Team must provide the client with a prompt written acknowledgement that it has received the complaint, and a copy of this policy. The complainant will be kept informed thereafter, in plain language and without undue delay, of the progress both of the measures being taken for the resolution of the complaint and of the complainant’s further options, including their potential right to refer the complaint to an alternative dispute resolution entity.



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Complaints Monitoring

Compliance with these policies and procedures is monitored through GIM's Compliance Monitoring Programme. Details of all incidents are reported quarterly to the GIM Risk Management Committee, the Group Risk Committee and the Partners of GIM.

Complaints Process Time Limit

GIM will aim to respond to, and resolve, all complaints promptly and within a reasonable timeframe.

Complaints Forwarding Rules

When GIM has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in a complaint, it may promptly forward the complaint (or the relevant part of it) in writing to that other respondent. However, it must also inform the complainant promptly in a final response of the reason for forwarding the complaint, and include the other respondent's contact details. Where jointly responsible for the fault alleged in the complaint, GIM must comply with its own obligations under the FCA's Dispute Resolution rules in respect of those parts of the complaint which still apply to GIM.

Record Keeping Requirements

Details of all complaints and the measures taken for their resolution will be recorded and kept for at least five years from the date the complaint was received. Estera also retains records of complaints.

Contact Details

All complaints and requests for review under this Complaints Policy should be addressed as follows:

Post: Sedef Koktenturk
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March 2020