



**Bridge Fund Management Limited**

**2023**

**Complaints Policy**

## Introduction

Bridge Fund Management (the “Company”) is authorised as an Alternative Investment Fund Manager (“AIFM”) under the European Union (Alternative Investment Fund Managers) Regulations 2013 (the “Irish AIFM Regulation”) and as a UCITS Fund Manager under the EU Commission Delegated Regulation (EU) No. 231/2013 (the “Commission Regulation”) (collectively, the “AIFM Regulations”) and the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2015 (the “UCITS Regulations”).

The Company’s fundamental objective is at all times to conduct its business by acting honestly, fairly and professionally in the best interests of our Clients. In this context, the term Clients refers to the Funds managed by the Company. In practice, the definition extends to the Fund’s underlying investors. All the rules and requirements outlined in this Manual are applications of this to specific business/regulatory issues.

The Company is committed to acting ethically in conducting its business. This high level and over-arching concept is achieved through every employee (including the Company’s management and Officers) of the Company acting in an ethical way and accepting personal responsibility for their actions in all of their dealings.

This policy addresses the handling of complaints and errors to ensure that complaints received by the Company and its delegates and errors identified are addressed promptly and effectively.

Complaints may be received by the Company through Investment Managers/Advisors, Administrators, Depositaries, Distributors or directly from any underlying shareholders of the underlying Funds or ICAVs managed by the Company. All complaints will be reported to the Board by Designated Persons or the Compliance Officer.

The Directors of the Company are committed to ensuring that any complaints made by its clients are dealt with in a timely and comprehensive manner, in line with best practice and regulatory requirements to include the Consumer Protection Code.

## Definitions

Complaint	A statement of dissatisfaction addressed to a firm by a natural or legal person relating to the provision of (i) an investment service provided under MiFID, the UCITS Directive or the AIFMD; or (ii) a banking service listed in Annex I to the CRD; or (iii) a service of collective portfolio management under the UCITS Directive.
Complainant	A natural or legal person who is presumed to be eligible to have a complaint considered by a firm and who has already lodged a complaint.
Date of receipt	The date of receipt of the complaint is the day written correspondence is received into the office.

In the case of a face to face or telephone complaint, the day of receipt of the complaint will be the day the face to face meeting is held on which the telephone complaint is made.

## Format of complaint

1. The complaint should take written form. “Written” includes hard copy, and electronic correspondence but excludes social media messaging and text messages.
2. Complaints which are made verbally or in a face to face meeting must also be considered complaints and the client is asked to forward the complaint in writing.
3. Where a verbal complaint is made outside of a formal face to face meeting or via telephone the staff member is required to ask the complainant whether they wish to make a formal complaint. Examples of this could be a complaint at an event held by the company or in a social situation which is not a firm related event.
4. Where a client is unhappy about some aspect of business and it is not clear whether they are making a formal complaint the staff member is required to ask the client whether they wish to make a formal complaint.

## Complaints Management Policy

This procedure will not apply where a complaint has been resolved to the client's satisfaction within **five business days, provided that a full written record of the matter is maintained and can be provided to the Company**. The client must also be informed in writing that the matter has been resolved. Any complaint a client may have should be directed in writing as set out below. Where a client makes a complaint in person or over the telephone irrespective of whether the line is recorded or not, the client must be asked to forward that complaint in writing.

Where a verbal complaint is made outside of a face to face meeting or over the telephone the staff member of the Company and/or Delegate is required to ask the complainant whether they wish to make a formal complaint. Examples of this could be a complaint at an event held by the company or in a social situation which is not a firm related event.

### Records

1. Complaints should be directed in writing to the registered address of the Company. Where a client makes a verbal complaint and in the case of a telephone complaint, whether a telephone line is recorded or not, the client must be asked to forward that complaint in writing.
2. Where a face to face or telephone complaint is not followed up by the client in writing the recipient of the complaint must record the client's face to face or telephone complaint as if it had been made in writing i.e. it cannot be assumed that the complaint has not been made.
3. Any complaint must be recorded in a durable medium at all times.
4. Any complaint made whether in person or over the telephone must be followed up with written confirmation to the client of details discussed.
5. All records relating to a complaint must be saved in a single log and location and backed up.
6. The Compliance Officer will maintain a complaints log. See below.

Complaints records should include the following where applicable:

1. Any affected clients that were dissatisfied with the outcome
2. There were difficulties contacting affected clients and the dates and format of those attempts
3. A refund could not be made.

The Company must not benefit from any balance arising out of a refund, which cannot be made, in respect of an error.

### Resolution and response times

The Company must have in place a written procedure for the proper handling of complaints. This procedure need not apply where the complaint has been resolved to the complainant's satisfaction within five business days, **provided however that** a record of this fact is maintained. At a minimum this procedure must provide that:

1. The Company must acknowledge each complaint on paper or on another durable medium within five business days of the complaint being received;
2. The Company must provide the complainant with the name of one or more individuals appointed by the Company to be the complainant's point of contact in relation to the complaint until the complaint is resolved or cannot be progressed any further;
3. The Company must provide the complainant with a regular update on paper or in 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;
4. The Company must 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 Company must inform the complainant of the anticipated timeframe within which the Company hopes to resolve the complaint and must inform the client that they can refer the matter to the relevant Ombudsman, and must provide the client with the contact details of such Ombudsman; and
5. Within five business days of the completion of the investigation, the Company must advise the consumer on paper or in 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 **client** can refer the matter to the relevant Ombudsman, and
  - iv. The contact details of such Ombudsman.



### Complaints log

The Company must maintain an up to date log of complaints from clients. The Compliance Officer has responsibility for the Company's complaints log which shall be saved in the compliance folder on the network. Access to the log should be restricted i.e. (password protected or the folder access restricted)

The Executive Director will be informed of complaints as they arise. In addition any complaints made and their status shall be reported at oversight committee meetings and/or at quarterly board meetings.

The log contains the following

1. **Details** of the complaint;
2. The **date** a complaint was received
3. A **summary** of the Company's response(s) including dates;
4. Details of any other relevant **correspondence** or records;
5. The **action** taken to resolve each complaint;
6. The **date** the complaint was resolved; and
7. Where relevant, the **current status** of the complaint which has been referred to the relevant ombudsman

### Management and governance

The complaints log and the status of any complaint should be addressed at each quarterly board meeting for the purposes of good governance and oversight. The Company must ensure that there is an analysis of the pattern of complaints to include whether a complaint is an isolated issue or a more widespread issue. Any analysis performed must be included in reports made.