

Muzinich & Co. (Ireland) Limited Complaints Policy

1. Introduction

- 1.1. Muzinich & Co. (Ireland) Limited (the "Company") is regulated by the Central Bank of Ireland ("Central Bank") as a UCITS management company and AIFM, and has adopted this Complaints Policy (this "Policy") as part of its internal arrangements to ensure it has an effective and robust policy in place in relation to the management of any investor complaints.
- 1.2. A complaint (as defined in MiFID) is a statement of dissatisfaction addressed to the Company by a client or potential client relating to the provision of investment services and activities.

2. Policy

2.1 The Company makes all possible efforts to conduct its operations in a manner that avoids investor complaints. The Company ensures that any complaints are easy to report, acknowledged and dealt with quickly, fairly and sensitively.

3. Scope of Policy

- 3.1. This Policy covers all investor complaints made to the Company or its delegates with respect to Irish funds. The Company has a separate complaints policy in place for its Luxembourg funds.

4. Complaints Procedure

- 4.1. Acknowledgement of a complaint is made within 5 business days upon receipt of a complaint.
- 4.2. A holding letter must be sent every 10 business days providing a progress update and a reason why a response cannot be provided.
- 4.3. A final response should be provided within 30 business days of the receipt of a complaint.
- 4.4. Formal responses must include the Company's understanding of the complaint, details of its investigations and reasoning for the provision or non-provision of a financial or other compensation. If the Company is refuting the complaint, it must advise the complainant of the rationale for doing so.
- 4.5. All relevant parties must be kept advised of the action taken through to final resolution of the complaint.
- 4.6. Under Irish regulatory requirements, any complaints relating to a consumer must be closed out within 40 days. Where the 40 day period is due to elapse and the complaint is not resolved the complainant will be contacted to inform them of the anticipated timeframe within which the complaint should be resolved.
- 4.7. Complainants are notified that they can contact the Financial Services Ombudsman directly with their complaint once the 40 day period has ended and/or if they are dissatisfied with the outcome of their complaint.
- 4.8. The Designated Person for Regulatory Compliance will maintain a complaints log and records of all complaints.

5. Complaints received by the Company's delegates

All complaints received by the Company's delegates will be notified to the Company and will be dealt with in accordance with the above procedures. The delegates will agree any course of action and / or response to an investor who makes a complaint with the Company.

6. Policy Update

- 6.1. This Policy will be reviewed on an annual basis or as required by the Company.

A paper copy of the complaints policy may be obtained free of charge on request from the Company.