

Complaints Handling Procedure

Relevant Rules: FCA DISP 1, 2.7, Investment Advisers Fiduciary Duty; Advisers Act 203(e)(6), Circular CSSF

14/589; NFA Compliance Rule 2-29

Rules Summary: Firms must have effective and transparent procedures for the fair and prompt handling of complaints. Furthermore, firms are required to recognise that complaints need to be resolved.

Introduction

On occasion, BlueBay Asset Management LLP ("BlueBay") may receive a complaint about the provision of services. It is BlueBay's policy to handle any complaint promptly and courteously. All complaints will be treated seriously.

In accordance with FCA DISP 1, BlueBay has put in place procedures for the handling and review of complaints and to ensure that such complaints are handled properly and are resolved in a prompt and timely manner, taking into account the complainant's interests.

The FCA defines a complaint 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.

Making a Complaint

A complainant who has a complaint should do so in writing using one of the following methods:

- Via email: compliance@bluebay.com
- Via post:
 Global Head of Compliance
 77 Grosvenor Street
 London
 W1K 3JR

How We Will Handle Your Complaint

Upon receipt of a complaint the Global Head of Compliance, or an appropriate member of the Compliance Team, will promptly commence investigation and will acknowledge the complaint in writing within a timely manner and without any unnecessary delay. BlueBay will also notify the complainant of the person handling the complaint as part of the acknowledgement.

During the investigation of the complaint, BlueBay will regularly update the complainant in writing on the progress of the investigation. BlueBay will handle all complaints in accordance with the following four principles:

- BlueBay will conduct a transparent review process for the complainant;
- No additional costs or fees will be incurred by the complainant as a result of their complaint;
- BlueBay will adopt an objective approach to the investigation of the complaint; and
- BlueBay will conduct its investigation of the complaint and will communicate progress to the complainant in a timely manner.

Following the conclusion of BlueBay's investigation, BlueBay will provide a written response to the complainant, notifying them of the outcome of the investigation and the actions proposed to resolve the complaint.

Financial Ombudsman Service (FOS)

If the complainant is not satisfied with the resolution or response given by BlueBay, the complainant can refer the matter to the FOS.

The FOS provides a free, independent and unbiased assessment of complaints referred to it. The FOS can be contacted directly via the following contact details:

Financial Ombudsman Service Exchange Tower London E14, 9SR

Telephone: 0800 0234567

E-mail: complaint.info@financial-ombudsman.org.uk

Website: www.financial-ombudsman.org.uk

The Ombudsman can only consider a case when BlueBay's own complaints procedure has been exhausted. The Ombudsman's findings are generally regarded as binding; however, the complainant is still able to take private legal action if they do not agree with the Ombudsman's conclusion.

Online Dispute Resolution

The European Commission has established an Online Dispute Resolution Platform (ODR Platform) which the complainant can access at the following website: https://webgate.ec.europa.eu/odr/.

The complainant may use the ODR Platform to submit a complaint and conduct an Alternative Dispute Resolution procedure online if they are resident in the EU and have a complaint about an online product or service. The platform will then send the complainant's complaint to the FOS for an independent review. As the ODR platform will ultimately re-direct your complaint to FOS, you may prefer to contact us or FOS directly in the first instance.

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