
COMPLAINTS POLICY

Contents

1. Introduction.....	2
2. What is a complaint?	2
2.1 What is the firm’s approach to complaints?	2
2.2 Complaints about other firms	2
2.3 Actions to be taken once a complaint has been closed	3
Appendix A: Complaints Register	4

1. Introduction

CWC is always conscious of its duty to service the Fund and its investors fairly. However, it recognises that there may be occasions when things go wrong, and when its investors have cause to complain to their providers.

CWC should not expect to receive complaints from investors directly but is aware of their right to do so and fully understands the FCA's detailed requirements for the handling of complaints by regulated firms in its Dispute Resolution (DISP) sourcebook. CWC also recognises that, whilst an investor who has complained is clearly a dissatisfied with certain aspects of the Fund, that handling a complaint well can help to retain investors.

We will ensure that our complaints handling procedures are made available to our clients, so that they are clear on our remit in these matters.

2. What is a complaint?

The firm is fully aware of the FCA's definition of a complaint, which is:

“Any oral or written expression of dissatisfaction, whether justified or not, about the provision of, or failure to provide, a financial service; and which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.”

Complaints must be accepted in the form they are received, e.g., letter, telephone call, email, fax, personal visit, etc. If you receive an oral complaint, it is not acceptable to ask the complainant to put the matter in writing before it can be looked at. There will be no charge for the handling of a complaint.

Similarly, complaints received from other parties who are acting on behalf of the Fund's investors, must also be treated in the same way as if the investor had made the complaint directly to the firm. For the purposes of this Complaints Procedure, the person or firm submitting the complaint is referred to as the 'complainant' whereas the person they are complaining on behalf of is referred to as the 'investor'.

2.1 What is the firm's approach to complaints?

CWC promotes transparency within its client network and encourages the sharing of complaints cases with the business so that it can identify any key areas of improvement in regard to its practices and procedures.

Anders Jegers ('Anders') will be responsible for receiving copies of formal complaints made by investors, reviewing them, and logging the details on a Complaints Register.

2.2 Complaints about other firms

It is the responsibility of the investor's provider to determine whether the complaint concerns other firms and how it goes about forwarding the complaint to them. Anders will maintain such data on the register, for information purposes only.

2.3 Actions to be taken once a complaint has been closed

Records need to be kept of complaints which relate to CWC, albeit indirectly. This will allow CWC to identify any trends which may need to be addressed.

Anders will consider the lessons to be learnt from the complaint (including root cause analysis), and whether any of the following are required:

- A change to the firm's practices or procedures
- Additional training for all staff

Complaints should also be reviewed in terms of the firm's breaches policy and consideration given as to whether a regulatory breach has occurred of which the FCA should be informed.

The firm is also required to report complaints to the FCA as part of routine complaints data reporting, which includes any obligations in relation to ongoing alerts for retail adviser complaints.

In line with the policy requirements, the firm must consider and make the necessary notifications to its insurers under its PII (Personal Indemnity Insurance) policy of any actual or potential complaint. This must be done at the earliest opportunity.

Appendix A: Complaints Register

CWC maintains a Complaints Register, as follows:

Date of complaint	Name of investor	Name of complainant (if different from the investor)	Product type or business area which the complaint concerns	Date acknowledged	Date final response sent	Outcome	Redress offered (if any)	Referred to FOS (Y/N)	Date of FOS judgement	Outcome of FOS judgement	Redress paid on FOS instructions (if any)