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**HFQ Fund Management S.A.R.L**

**Complaints handling policy**

Adopted by HFQ Fund Management S.A.R.L

with effectiveness from October 1<sup>st</sup>, 2024.



### **Policy statement**

It is the policy of HFQ Fund Management S.A.R.L (the “Company”) to respond to all customer issues, disputes and complaints quickly, decisively and accurately. The Company will make every effort to reach a mutually agreeable resolution to each complaint.

### **Objective**

The Company seeks to maintain its reputation as a firm delivering high quality professional services.

The Policy is designed to provide guidance on the manner in which the Company receives and handles complaints made against the firm, its partners and its employees.

The objective of the Policy is to assist the firm, its partners and employees in resolving complaints in an efficient, effective and professional manner.

### **What is a complaint?**

The Policy is intended to address complaints made to the Company. A complaint under this Policy is defined as a written expression of dissatisfaction:

- from, or on behalf of, a person about the provision of, or failure to provide, a service that relates to investment business carried on by the registered person,
- which alleges that the complainant has suffered (or may suffer) material distress or material inconvenience.

Any person or organisation (the complainant) who is dissatisfied with a product or service provided by the firm, for any reason, may contact the Company to complain. A complaint may be written. At times, complaints can be by way of negative feedback, which may not require a resolution or formal follow-up. While this type of feedback is valuable to the firm, the Policy does not apply to feedback of this nature.

### **Record keeping**

The Record Keeping Policy sets out the requirements for maintenance of records. Care must be taken to ensure that all material relating to the resolution of a complaint is retained. We are committed to acknowledging all complaints immediately upon receipt. Once a complaint has been received, we will undertake an initial review of the complaint.

We will endeavour to resolve complaints within 20 business days of receiving the complaint, but this will not be possible on all occasions. Where our review exceeds 20 business days, we will contact you to inform you of the reason for the delay, and indicate to you when we expect to be in a position to complete our review of the complaint.

Records of all complaints will be retained for ten (10) years. Records will include all dates of our communications with the complainant including the date of initial receipt, dates of all subsequent communications, and the date of final disposition.



### **Handling a complaint**

Email is the most efficient method of complaint transmission. Complaints should be sent to our dedicated complaint email address at: [compliance@hfgfundmanagement.com](mailto:compliance@hfgfundmanagement.com)

Where a complaint is about a particular engagement, product, partner or employee and you are familiar with the engagement team working on your matter, you may wish to address your complaint to an appropriate member of that engagement team by letter, email or fax. Where possible, complaints should be made in writing so that the details of the complaint are clear and complete.

When making a complaint, please provide the following information:

- Your name, position and contact details;
- Your relationship with the Company (i.e. the nature of your engagement with the Company, if you are a client);
- Your contact person within the Company;
- The nature of the complaint (including when the conduct giving rise to the complaint occurred);
- Details of the Company partner or employee involved (if applicable);
- Copies of any documentation supporting the complaint.

Procedures for the reasonable and prompt handling of complaints must be effective and transparent. For the purposes of this document, 'prompt' means in the shortest time practical but without compromising either the fairness or the thoroughness of the investigation and handling process. General procedural requirements are set out below:

- System for logging and tracking progress;
- Prompt acknowledgment;
- Prompt written reply (including by email) or holding response;
- Keep complainants reasonably informed of the progress of the complaint investigation;
- Complaints must be promptly, thoroughly and consistently investigated, where practical, by an independent person;
- Regular review of progress of outstanding complaints;
- Communication of Management Information on a regular basis and in a timely manner;
- Robust Record Retention process.

### **Response to a complaint**

Once we have reviewed your complaint, we will provide you with a written response. If you are dissatisfied with the response from the Company, you have the right to ask for reconsideration of the response by the Compliance Officer. Such a request should be made in writing and forwarded by post, email or fax to the address provided above.