

## Our Complaints Policy

We aim to ensure that we treat our customers fairly at all times. Any eligible complaint or a complaint from a MiFID client is investigated diligently and impartially, assessing fairly and promptly the subject matter of the complaint, whether the complaint should be upheld and what remedial action or redress may be appropriate.

The FCA's Dispute Resolution ("DISP") handbook sets out the rules relating to the handling of complaints from eligible complainants and MiFID clients. We have determined that the Firm has no eligible complainants under the DISP rules and, as such, it is exempt from FCA rules in this area however it could receive MiFID complaints.

A 'MiFID complaint' is defined 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'.

In relation to the Firm's MiFID business, complainants include retail clients, professional clients and eligible counterparties. In addition, it also includes potential investors. Professional clients and eligible counterparties do not come under the jurisdiction of Financial Ombudsman Service ("FOS").

We are required to establish, implement and maintain effective and transparent complaints management policy and procedures for the prompt handling of clients' or potential clients' complaints. This policy has been approved by the Firm's senior management.

### What is a MiFID Complaint?

A MiFID complaint is, amongst other things, a complaint to which Article 26 of the MiFID Org Regulation applies, and so refers to a complaint about:

- The provision of investment services or ancillary services to a client by an investment firm;
- The provision of one or more investment services to a client by a CRD credit institution;
- Selling structured deposits to clients, or advising clients on them, where the sale or advice is provided by an investment firm or a CRD credit institution;
- The activities permitted by Article 6(3) of the UCITS Directive when carried on by a collective portfolio management investment firm; and
- The activities permitted by Article 6(4) of the AIFMD when carried on by a collective portfolio management investment firm.

A MiFID complaint is also a complaint about the equivalent business of a third country investment firm, although requirements apply to complaints from retail clients and elective professional clients only.

## Our Complaints Process

### Complaints Handling

Any member of staff who receives a complaint from a MiFID client (as defined above) is required to pass the details on to the Compliance Officer immediately. The Compliance Officer will then analyse the complaint to ensure that any risks or issues are identified and addressed. Complainants should submit any complaints to:

The Compliance Officer  
Trinetra Investment Management LLP  
7 Stratford Place  
London W1C 1AY

The Compliance Officer will communicate with clients or potential clients clearly, in plain language that is easy to understand, and will reply to the complaint without undue delay informing them about their options, including that they may be able to refer the complaint to an alternative dispute resolution entity. Clients and potential clients may submit complaints free of charge.

### Complaints Forwarding

When we have reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in a complaint, we will promptly forward the complaint, or the relevant part of it, in writing to that other respondent. We must inform the complainant promptly in a final response of the reason for forwarding the complaint, including the other respondent's contact details. Where we are jointly responsible for the fault alleged in the complaint, we are required to comply with our own obligations under the DISP rules in respect of that part of the complaint it has not forwarded.

### Record Keeping Requirements

The Firm's Compliance Officer is responsible for recording each complaint received and the measures taken for its resolution. These records are kept for at least five years from the date the complaint was received. The Compliance Officer also ensures that the Firm provides the FCA with a complete report on the complaints received from MiFID clients twice a year.

Please refer to Trinetra's 'Complaints Guidance for Complaints under ASIC Regulatory Guide 271' document for information about complaints in Australia. Perpetual has provided their Complaints Handling Guidance detailing the relevant deadlines for dealing with any complaints received (see [link](#)).

January 2024