

Complaints Handling Policy

1.1 Scope of this policy

This policy sets out Inflexion's procedure to ensure an effective, transparent and prompt handling of complaints received from, or on behalf of, its existing or former Clients in relation to potential wrongdoing, error or disruption in connection with Inflexion's investment advisory services.

1.2 What complaints are relevant to this policy?

Any complaint relating to the provision of, or failure to provide, certain financial or investment advisory services by Inflexion where the Client has suffered (or may suffer) financial loss, material distress or material inconvenience (each a "Relevant Complaint") is in scope of this policy.

A Relevant Complaint may take the form of any oral or written expression of dissatisfaction with respect to such matters, whether justified or not.

1.3 How do I submit a complaint?

Clients may submit a 'Relevant Complaint' free of charge in any of the following ways:

- **Telephone:** +44 20 7487 9835
- **Email:** complaints@inflexion.com
- **In writing:** Compliance Team, Inflexion Private Equity Partners LLP, 47 Queen Anne Street, London, W1G 9JG.

Clients may also submit a Relevant Complaint by contacting their usual Inflexion contact in person, via email or telephone, or in writing.

Inflexion has appointed its Compliance Officer as the person responsible for managing the complaints process.

1.4 Complaints handling process

Receiving complaints

Any Relevant Complaint (whether written or otherwise) received by Inflexion or Inflexion Staff, will be reported without delay to Inflexion Compliance, even if such complaint has already been formally or informally resolved, or otherwise addressed. In instances where a Relevant Complaint was expressed verbally to a member of Inflexion Staff (e.g. in person or by telephone), the receiving Staff member will fully document its content to a member of Inflexion Compliance, including:

- the name, address, telephone number and email (if applicable) of the complainant, and whether the Relevant Complaint was reported on behalf of someone else;
- a description of the Relevant Complaint and a list of specific concerns including any requested action made by the complainant; and
- the complainant's preferred method of communication.

Acknowledging complaints

In order to reassure the complainant that the Relevant Complaint is being appropriately reviewed and dealt with, Inflexion Compliance will issue the complainant an acknowledgment letter (or email) promptly, communicating that Inflexion:

- will investigate the matter and respond fairly and promptly;
- highlight that if the investigation is not completed promptly, the complainant will be informed of the reasons for the delay; and
- point out that upon completion of the investigation, the complainant will be informed of the outcome and options available.

Complaints investigation and resolution procedure

Following receipt and acknowledgement of a Relevant Complaint, Inflexion Compliance will:

- investigate the Relevant Complaint diligently, and impartially, obtaining additional information where necessary in each case in order to assess fairly, consistently and promptly:
 - the subject matter of the Relevant Complaint;
 - whether the Relevant Complaint should be upheld;
 - what remedial action may be appropriate; and
 - if there are reasonable grounds to determine that a 3rd party is solely or partly responsible for the matter alleged in the Relevant Complaint;
- provide the complainant with a full and clear written explanation of Inflexion’s position on the Relevant Complaint within 30 business days of the investigation concluding;
- inform the complainant throughout the complaint handling process of the progress of the measures taken to resolve the Relevant Complaint, including expected timing and if additional time will be required;
- communicate to the complainant, that if dissatisfied with the resolution, the Relevant Complaint may be able to be referred to an alternative dispute resolution entity, or the complainant may take civil action; and
- consider a Relevant Complaint closed when it receives confirmation from the complainant that they are satisfied with the findings and the resolution of the investigation.

All Relevant Complaints are handled sensitively and in accordance with relevant data protection and regulatory requirements.

1.5 Complaints reporting and recording

- **External reporting:** Inflexion will submit a bi-annual report to the FCA, containing details of each Relevant Complaint it has received during the relevant period. For the relevant period, such report will state the total number of all complaints and give appropriate detail and context on each. The report will also confirm the post investigation outcome (upheld, closed, dismissed or otherwise) of each complaint, including whether any redress was offered;
- **Internal reporting:** Inflexion Compliance will report the occurrence and status of all Relevant Complaints, to Inflexion’s Management Committee on a periodic basis. Any Relevant Complaints of a material nature will be reported immediately internally by Inflexion Compliance, if appropriate, to the relevant senior persons at Inflexion, including, if necessary, Senior Managers or relevant members of the firm’s Executive Committee;
- **Recording of complaints:** Details of all Relevant Complaints received by Inflexion, including information regarding the nature and the manner of resolution, are recorded by Inflexion Compliance in Inflexion’s Complaints Log.
 - Inflexion Compliance maintains records of the Complaints Log and any associated files for 5 years from the date on which the Relevant Complaint was received.