

NBAMIL COMPLAINT PROCEDURE

1. NBAMIL Policy

It is the Firm's policy that a complaint must be investigated promptly and thoroughly, handled properly and, where appropriate, fairly rectified. A complaint received will be handled free of charge. A complaint is any expression of dissatisfaction, whether justified or not, about the firm or the firm's appointed agents' provision of, or failure to provide a financial services activity.

The "**Complainant**" should be requested to submit in writing any complaint expressed during the course of a telephone conversation or meeting, unless it can be resolved immediately. A client complaint may be submitted to:

Neuberger Berman Asset Management Ireland Limited
The Designated Person for Regulatory Compliance
2 Central Plaza, Dame Street,
Dublin, D02 T0X4
Ireland
Email: NBAMILCompliance@nb.com

2. Complaint Procedure

Any complaint received within NB must be notified to the NBAMIL Designated Person (DP) for Regulatory Compliance promptly by the recipient of the complaint. The complaint will be handled competently, diligently and impartially, obtaining additional information from the area to which the complaint is directed. The recipient must provide the DP with all details and correspondence relating to the complaint *in writing* so that a full assessment of the facts can be considered and appropriate response drafted. This should include:

- the subject matter of the complaint;
- whether the complaint should be upheld;
- what remedial action or redress (or both) may be appropriate; and
- if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.

NBAMIL will ensure that it maintains an effective and transparent system for the reasonable and prompt handling of the complaint. The DP shall be responsible for drafting the response to the Complainant. The NBAMIL Legal Department may be consulted by the DP depending on the nature and seriousness of the complaint e.g. where litigation is potentially an issue.

The DP will:

- Acknowledge receipt of the complaint to the Complainant in writing within 5 working days of having received the complaint;
- Communicate with the complainant in clear, plain language that is easy to understand and should be provided to the complainant without undue delay.
- Ensure that the complainant is kept informed regularly thereafter of the progress of the measures being taken to resolve the complaint, including being provided with a direct point of contact.
- Attempt to close out the complaint within 90 days and confirm as such to the Complainant.