

Summary of UK Complaints Handling Policy

Our commitment to you

This summary of our complaints policy sets out how Polus Capital Management Limited ('Polus') values its clients (including for this purpose investors in the Funds it manages) and how the firm ensures they are treated fairly. We therefore set out below how the firm aims to ensure that its clients are treated in a timely and transparent manner in the event that a client has a need to complain.

Should you have a cause for a complaint, please contact our Chief Compliance Officer or Chief Legal Officer by using one of the following options:

Telephone: +44 (0) 2072594800

Email: cairn_legal@cairncapital.com

Writing to us directly at:

62 Buckingham Gate

London

SW1E 6AJ

United Kingdom

Scope

This Policy is applicable to those funds managed by Polus ("Funds") and the investors in these Funds or clients who have given us bespoke mandates under which we provide investment management services (together "Clients" and "Complainants"). Where you as a Complainant falls within the FCA Handbook definition of "Eligible Complainant" (or as otherwise may be stipulated by the FCA Handbook) then there are regulatory timeframes to be adhered to by Polus in addressing the complaint.

An Eligible Complainant does not include eligible counterparties or professional clients (including those opted up to professional classification) unless they also qualify as a "Consumer". A Consumer for these purposes is any individual acting for purposes which are wholly or mainly outside that individual's trade, business, craft or profession. So, whereas investors in Polus Funds may be categorised as professional clients, they may also be categorised as Consumers and therefore an Eligible Complainant.

Responding to your complaint

The complaint will be investigated thoroughly, impartially and fairly by Legal and Compliance. Polus will send a prompt written acknowledgement providing reassurance that the firm has received the complaint and is dealing with it.

Polus will endeavour to investigate a complaint and to provide a final response to the complainant promptly and in any event to resolve it within eight weeks from the date of the receipt of the complaint. During the investigation of the complaint, Legal and Compliance update the Complainant in writing on the progress of the investigation.

Following the conclusion of our investigation, we will provide a written response to the Complainant, notifying them of the outcome of the investigation and the actions proposed to resolve the complaint. If the complaint is held to be founded, we will notify the complainant of the measures we intend to

undertake and the deadlines by which they will be realised. If the complaint is held to be unfounded, Polus will provide a clear and exhaustive explanation of why it has not been upheld, and provide information regarding access to any relevant government protection scheme, considering the categorisation of the complainant.

If after eight weeks Polus are still not in a position to resolve the complaint, we will write to the complainant explaining why the matter remains unresolved, advise when they can expect a final response, and advise that the complainant may be eligible to refer the matter to the Financial Ombudsman Service ('FOS').

Unhappy with the outcome?

If the complainant is dissatisfied with the final response they have received (at any stage of the process), they may take their complaint to the FOS within six months of receiving the final response from Polus, by visiting the FOS website and submitting an online complaint form <http://www.financial-ombudsman.org.uk/> or calling the FOS helpline on 0800 023 4567.

This document is issued by Polus Capital Management Limited (FRN: 400045) at 62 Buckingham Gate, London SW1 6AJ. Authorised and regulated by the Financial Conduct Authority.