

Complaints Policy

Heptagon Fund ICAV

Heptagon Capital Limited, as the Investment Manager of Heptagon Fund ICAV (the Fund), is responsible for receiving and investigating any complaints received from investors in the Fund.

What is a Complaint?

A complaint is an 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. A complaint can be made by potential, actual or former clients, regardless of whether they are categorised as retail, professional or eligible counterparty.

A complaint can be communicated by any reasonable means such as by letter, telephone, e-mail, social media or in-person). All complaints should be submitted free of charge.

How to complain?

In the first instance, please contact Heptagon Capital Limited at the address below:

Name:	Darryl Vine
Contact Address:	Heptagon Capital Limited The Hedge, Triq ir-Rampa ta'San Giljan, Balluta Bay, St Julians Malta
Contact Email:	compliance@heptagon-capital.com
Contact Phone:	+356 2778 0099

Should you be unhappy with the resolution of your complaint, you may contact the Central Bank of Ireland/or other regulatory authority.

The Investment Manager will aim to handle complaints independently, where possible, by managing any potential conflicts and ensuring that any individuals named in the complaint are not involved in the investigation of such complaint, or where this is not possible, that four eyes checks take place before issuing the final response. Such checks may be carried out internally or via a third party (compliance) consultants/legal advisors.

Once a complaint has been received by the Investment Manager, the Investment Manager must:

1. Send the complainant a prompt written acknowledgement providing early reassurance that the Investment Manager has received the complaint and are dealing with it, including a copy of the complaints procedure.
2. Ensure the complainant is kept informed thereafter of the progress of the measures being taken for the complaint's resolution; and

3. Record the complaint in the complaints register, including but not exclusively, record keeping of each stage of the process, any potential conflicts of interest that arose during the complaints process, who dealt with the complaint, location of evidence used to assess the complaint, whether the complainant is an eligible complainant, whether the complaint is upheld, what remedial action/redress is required (if appropriate) and confirmation the remedial action/redress has been complied with.

The process should ensure that the Investment Manager:

- Investigates the complaint competently, diligently and impartially in an independent manner where possible;
- Assesses the complaint fairly, consistently and promptly.