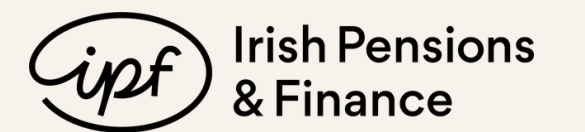


Complaints Procedure

This procedure is operated by Irish Pensions and Finance in relation to its financial services provided under the Consumer Protection Code.



Our objectives:

- To respond to complaints in a courteous, timely and fair manner.
- To endeavour to address the specific issues raised by our customers and, where appropriate, update our procedures to avoid re-occurrence of problems.
- To endeavour to achieve a situation where our customer feels we have addressed the complaint, but if he/she remains dissatisfied with the outcome of our efforts, to ensure that he/she is notified of the right to refer the matter to the Financial Services and Pensions Ombudsman (FSPO).

Procedure

1. Irish Pensions and Finance will establish and maintain a complaints file and all complaint records will be kept for six years.
2. Where Irish Pensions and Finance receives an oral complaint, we will offer the consumer the opportunity to have the complaint treated as a written complaint. Irish Pensions and Finance will investigate the complaint based on our understanding of the issue.
3. Irish Pensions and Finance will acknowledge in writing each complaint within 5 business days of receipt. This acknowledgement will contain a copy of these procedures and notification that the complainant can refer the matter to the Financial Services and Pensions Ombudsman (FSPO) if he/she is not happy with the outcome of our investigation, or if the matter has not been resolved within 40 business days, the anticipated timeframe within which the firm hopes to resolve the complaint.
4. Contact details of the Financial Services and Pensions Ombudsman (FSPO) will also be provided.
5. We shall investigate the complaint as swiftly as possible, and the complainant will receive an update on the complaint at intervals of not greater than 20 business days starting from the date on which the complaint is made.

Procedure

6. The firm will attempt to investigate and resolve the complaint within 40 business days of having received the complaint; where the 40 business days has elapsed and the complaint is not resolved, the complainant will be informed of the anticipated timeframe within which the firm hopes to resolve the complaint and that the complainant can refer the matter to the Ombudsman and the contact details of such Ombudsman will be provided.

7. Within 5 business days of the conclusion of our investigation of the complaint, the firm shall send a written report of the outcome of this investigation. This report shall include an explanation of the terms of any offer that the firm is prepared to make in settlement of the complaint. We will also inform the complainant of the right to refer the complaint to the Financial Services and Pensions Ombudsman (FSPO) and will provide the consumer with the contact details of such Ombudsman.

3. Where it appears to the firm that the complainant is not satisfied with the outcome of our investigation, and where we feel that we cannot progress the issue further, we will immediately write to the complainant advising them of their right to refer the dispute to the Financial Services and Pensions Ombudsman (FSPO).

9. A senior manager will review the file before its conclusion and attempt to identify any procedures that can be implemented by our firm to avoid a repeat of the type of complaint received. Any new procedures will be immediately communicated to all staff and placed in the Written Procedures file.

10. The person responsible for complaints in Irish Pensions and Finance is: Carol Halpin

Controls: Complaints are included on the weekly agenda got the Compliance meeting with the CEO, COO, and Compliance Officer.

Complaints are also scheduled for discussion on the weekly agenda of the Senior Management Team

The Complaints log will record the following:

- a) Details of each complaint
- b) Date of receipt of the complaint.
- c) Summary of IPFs response including dates
- d) Details of any other relevant correspondence or records
- e) Action taken to resolve each complaint.
- f) Date of complaint resolution.
- g) Where applicable, the status of the complaint referred to the appropriate ombudsman.

The Person responsible for handling and investigating complaints from consumers must be of sufficient seniority and competence within the firm. Person responsible for handling complaints should ensure that:

- a) Has the authority to settle complaints.
- b) Any correspondence issued to a client is clear and in plain language.
- c) All staff are aware of the complaint's procedure.
- d) IPF highlight the existence of the Ombudsman.
- e) All complaints are treated under the above procedure.

An analysis of complaints must take place to analyse any patterns including investigating whether complaints indicate an isolated issue or a more widespread issue.

All complaints must be escalated to the senior management team and compliance function.

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