

LEDBURY SICAV PLC

Ledbury SICAV Plc (the “Company”) - Complaints Policy

February 2022

Introduction

The Company has established, implemented and maintains the following procedure for effective consideration and prompt handling of complaints received from investors or potential investors, in compliance with Part BII of the MFSA Investment Services Rules for Retail Investment Schemes (the "applicable rules).

The Company ensures that information regarding these procedures for investor complaints is made available to investors free of charge and that each official is made aware of this complaints handling procedure.

Complaints Handling Procedure

The Company always strives to deliver the best possible service, however, if you feel we have fallen short of these high standards and you wish to make a complaint then please contact us by emailing the compliance officer Carl Zammit, carl.zammit@zasmalta.com copying info@arlingtoncapital.ltd. It is important when writing to us that you provide as much detail as possible, in order for us to investigate the complaint correctly. We will acknowledge the complaint promptly and will then keep you informed of the progress of your complaint.

Once a complaint has been received, the Company will investigate the complaint competently, diligently and impartially. The Company will assess fairly, consistently and promptly whether the complaint should be upheld and what remedial action (if any) or redress (or both) may be appropriate. If appropriate, the Company will judge whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.

The Company will, on establishing its findings explain to the complainant promptly and, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress and will comply promptly with any offer of remedial action or redress accepted by the complainant.

The Company will, in line with the applicable rules, respond to complaints within seven business days. If within two months after receipt of the complaint the investigation has not been completed, the Company will inform the complainant in writing.

Failure to resolve Complaint

Should the Company not resolve the complaint to your satisfaction then the Office of the Arbiter for Financial Services (“OAFS”) in Malta provides an independent and impartial mechanism of

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resolving disputes outside of the courts' system, filed by customers against financial services providers authorised by the Malta Financial Services Authority ("MFSA").

The OAFS is an autonomous and independent body with the power to mediate, investigate, and adjudicate complaints filed by eligible customers against financial services providers licensed by the MFSA, the financial services regulator in Malta. The OAFS is totally independent and impartial of all parties concerned to the complaint. For more information, please see the OAFS website.

<https://financialarbiter.org.mt/content/step-1-complain-your-provider>

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