

Complaints Handling Policy – Information for Clients

About Vistra

Vistra is one of the larger independent trust and corporate services providers in the Island and the companies within the group have operated from Jersey for more than 20 years. At Vistra, our team has extensive experience of providing services to high net worth individuals and families and servicing their wealth management structures.

Vistra is defined as Vistra (Jersey) Limited (the affiliation leader) incorporating Vistra Trust Company (Jersey) Limited, Vistra Fiduciary Limited and Vistra Fund Services Limited.

Our Terms of Business

It is important to us that our clients are receiving a professional, high level of service. If we are not meeting your expectations we ask that you let us know as soon as possible. We are committed to working with you to resolve any issue identified.

Section 18 of our standard Terms of Business contains a clause concerning comments, queries and complaints.

Dealing with Complaints

We set out below how Vistra will deal with any complaint it receives and the timeframes within which we will respond to you.

A director of Vistra Jersey shall supervise the services provided in respect of each customer. Accordingly, if any matters arising from, or in connection with, the provision of our services give any cause for concern, these should be addressed, in the first instance, to the director responsible for the provision of the services you are receiving.

If the matter raised with the director is not resolved to your satisfaction, a complaint may then be addressed, in writing, to Vistra's Compliance Officer.

Vistra is committed to handling complaints diligently and in a competent, transparent and impartial manner.

It may be helpful to point out, per our Terms of Business, that recipients of trust company and funds services business (as defined in the Financial Services (Jersey) Law 1998) are currently not able to refer complaints to the Office of the Financial Services Ombudsman.

Complaints Process

Vistra is regulated by the Jersey Financial Services Commission ("JFSC") and complies fully with the Code of Practice for both Trust Company Business and Fund Services Business.

A copy of the Code, which includes provisions in respect of our obligations concerning complaints, can be found on the JFSC website www.jerseyfsc.org/pdf/FSB-Code-1-Sept-2016.pdf and www.jerseyfsc.org/pdf/TCB-Code-1-Sept-2016.pdf.

We will treat any expression of dissatisfaction you raise with us, which has not been satisfactorily resolved by the director responsible (by the end of the business day following receipt) as a complaint. If you:

- Have telephoned us we will make a record and process your complaint as if you had put it in writing.
- Wish to email or write to us we request you address your email or letter to the Compliance Officer.

In the event the director responsible is out of the office an alternate director will respond on their behalf.

In both scenarios, we will try our best to resolve the complaint. We will write to acknowledge your complaint (within 5 working days of receiving your complaint) and will provide you with a copy of this Complaints Handling Policy document. Our letter will advise you who will be managing the complaint, will confirm that your complaint is being considered and will inform you that you may next expect a

further letter within 10 working days (of the date of the letter acknowledging your complaint).

Our investigation of any complaint will be conducted fully and fairly by an appropriate party within Vistra. Any investigation will be undertaken with impartiality and in a competent and diligent manner. If your complaint involves a matter concerning a particular employee, we will ensure that employee will not take any part in investigating and assessing your complaint.

We may:

- Write to you to seek further information and, if we do, we will provide another date by which you will next expect to receive communication from us.
- Offer you a meeting, where we consider this to be appropriate. If a meeting is held we will follow up in writing.

We will keep you informed about the progress of your complaint, including details of any actions we are taking to resolve the complaint.

Where we require further time to investigate your complaint you will receive written communication setting out why further time is required and when you may next expect us to communicate with you.

Once our investigation of your complaint has concluded you will receive a formal written response. If applicable, we will specify any action that we are proposing to take, or have already taken, to resolve the complaint.

Resolution of Your Complaint

We will aim to send you our final response as soon as possible, within the timescales set out in our letters or as agreed with you. We hope to conclude your complaint within three months of receiving your complaint, unless we have agreed with you otherwise.

We hope our final response to you will conclude the matter to your satisfaction. Our final letter will advise you that we will consider the matter closed unless you notify us to the contrary within eight weeks.

If You Are Still Not Satisfied

If our resolution of your complaint does not meet your expectations please let us know. Should you wish to appeal your complaint and/or our handling of it, please contact (as applicable):

For matters concerning trust and company business	For matters concerning fund services business
The Managing Director Vistra (Jersey) Limited 4th Floor, St Paul's Gate 22-24 New Street, St Helier Jersey JE1 4TR	The Managing Director Vistra Fund Services Limited 4th Floor, St Pauls Gate 22-24 New Street, St. Helier Jersey JE1 4TR

Complaints to the Regulator

We aim to resolve your dissatisfaction with any part of our service offering and hope to continue our good working relationship. However, if your complaint remains unresolved, you are not satisfied with our final response or the way in which we have handled your complaint, you may contact our regulator, the JFSC.

The JFSC is responsible for the regulation and supervision of the financial services industry in Jersey in respect of banking, collective investment funds, fund services business, insurance business, general insurance mediation business, investment business, money service business and trust and company service providers.

You may find the following link of assistance if you wish to register a complaint with the JFSC: <http://www.jerseyfsc.org/pdf/The-Ombudsman-and-how-to-make-Consumer-Complaints-Nov-2015.pdf>

The JFSC's address is:

The Jersey Financial Services Commission
14-18 Castle Street, St Helier
Jersey JE4 8TP