

# Complaints Policy & Procedures

This document describes Mesirow Currency Management's (MCM)<sup>1</sup> policy and procedures for accepting, processing, and resolving complaints received from prospective and existing clients. A complaint received from a potential or existing client is investigated diligently, promptly and impartially, assessing the subject matter of the complaint, whether the complaint should be upheld and what remedial action may be appropriate.

## Complaints

A complaint is any 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.

Complainants include retail clients, professional clients, eligible counterparties and potential investors.

MCM has established, implemented and maintains an effective and transparent complaints management policy and procedures (described below) for the prompt handling of clients' or potential clients' complaints.

#### **Consumer Awareness**

MCM publishes on its website the details of the process to be followed when handling a complaint. Details include information about the complaints management policy and the contact details for the complaints management function. This information will be provided to clients or potential clients, on request, or when acknowledging a complaint.

# **Complaints Handling**

Complaints may be submitted orally or in writing using the contact information below. MCM staff who receive a complaint from a client are required to immediately pass the details to the email address in the contact information below. The Compliance Officer will then analyze the complaint.

The Compliance Officer will communicate with the complainant clearly, in easy-to-understand language, and will reply to the complaint without undue delay informing them about their options, including that they may be able to refer the complaint to an alternative dispute resolution entity. Clients and potential clients can submit complaints free of charge.

# Complaints Forwarding Rules

When MCM has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in a complaint, it may promptly forward the complaint, or the relevant part of it, in writing to that other respondent. MCM will inform the complainant promptly in a final response of the reason for forwarding the complaint,

<sup>1.</sup> MCM consists of the Currency Divisions of Mesirow Financial Investment Management, Inc. ("MFIM") and Mesirow Financial International UK, Limited ("MFIUK"). MFIM is a SEC registered investment advisor, a CFTC registered CTA and a member of the NFA. MFIUK is registered with the FCA.

including the other respondent's contact details. Where jointly responsible for the fault alleged in the complaint, MCM will comply with its own obligations (as applicable) in respect of that part of the complaint it has not forwarded.

## Record Keeping Requirements

MCM's Compliance Officer is responsible for recording each complaint received and the complaint remedy (if any). The Compliance Officer maintains these records for at least five years from the date the complaint was received.

Compliance with these policies and procedures is monitored through MCM's Compliance Monitoring Program. The Compliance Officer's annual report to MCM's senior management will include confirmation of any complaints received during the period under review, and their outcomes.

### Contact Information

Mesirow Financial Attention: Compliance Officer 353 North Clark Street Chicago, Illinois 60654 312-595-600 Compliance4@mesirowfinancial.com

## **Policy Review**

This policy and procedures are subject to annual review, amendment, and approval by MCM senior management and the MCM Compliance Committee. These reviews will account for changes in regulations and changes in business activities.

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