



ARCO SICAV PLC.

## **Complaints Handling Procedure**

Version: 01/April 2025

## EXECUTIVE SUMMARY

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This complaints handling procedure applies to Arco SICAV plc (the “Company”) in its relations with its underlying investors and sets out the procedures to be followed to handle any complaints.

This procedure aims to ensure that investors’ complaints are managed professionally, efficiently, and satisfactorily. The Compliance Officer (Ms Claire Camilleri Gauci) is the Complaints Handling Officer.

## 1.0 – STATEMENT OF INTENT

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To ensure that complaints handling is:

- Done efficiently and in line with legal requirements and industry best practices;
- Resolved in a timely manner;
- Handled to the reasonable customer's satisfaction and should serve as an opportunity to repair a relationship with the party (ies) concerned.

## 2.0 – WHAT IS THE PROCESS OF LODGING A COMPLAINT?

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A client complaint, either received verbally or in writing, may be defined as an expression of dissatisfaction, whether justified or not, regarding the provision of, or failure to provide, a financial service provided by the Company. It would typically involve a claim by the complainant that he/she has suffered, or may have suffered, economic loss, material inconvenience, or material distress.

The complaint must be dealt with as quickly as possible to resolve the complainant's issue. All complaints shall be sent to the Scheme's Compliance Officer and Complaints Handling Officer at: [info@aidcompliance.com](mailto:info@aidcompliance.com).

Upon receiving a complaint, the Company shall ensure an acknowledgement letter is sent within two business days. This letter or e-mail shall contain information regarding the complaints handling process and shall confirm that:

- a) The Company will investigate the complaint and;
- b) On completion of the investigation, the Company will write to the investor concerning the outcome.

Suppose the investigation has not been completed within 15 working days after receipt of the complaint. In that case, the Company shall issue a further letter or e-mail to the complainant informing him/her accordingly and requesting more time to investigate such complaint. The said letter/e-mail should be issued by the Company before the end of the 15 working day period and include the following:

- a) information as to what is causing the delay;
- b) an indication of when the investigation will likely be completed.

In communicating its final decision, the Company shall:

- a) Include a description of the complaint and the outcome of the Company's investigation;
- b) Set out the Company's final view on the issues raised in the complaint; and
- c) Include details of any redress being offered, if considered appropriate.
- d) Where decision does not fully satisfy the complainant's demand, the Company shall provide a thorough explanation of its position and that if the complainant is still not satisfied with the way the

complaint was resolved, he/she may refer the complaint to the Office of the Arbiter for Financial Services, N/S in Regional Road, Msida, Malta, established under the Arbiter for Financial Services Act, (Cap.555). Website is: <https://www.financialarbiter.org.mt/content/step-1-complain-your-provider>

Investors may download a copy of the Arbiter's Complaint Form from here: [Submit a complaint | OAFS](#).

### **3.0 – WHAT IS THE ROLE OF THE ARBITER FOR FINANCIAL SERVICES?**

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The principal duties and powers of the Arbiter for Financial Services are:

- a) To consider complaints from private consumers or micro enterprises arising out of or in connection with any financial services transaction;
- b) Act as mediator, investigate and adjudicate on such complaints between consumers and financial services providers.

The Arbiter for Financial Services is independent of the MFSA and has investigative and adjudicating powers. This means that in dealing with complaints, it can summon witnesses and request documents, and its final decision is binding but subject to either party's appeal from the decision. It is important to note that the Arbiter cannot consider complaints from companies or enterprises for Financial Services unless such entities fall under the definition of micro enterprises, as defined in Article 2 of the Arbiter for Financial Services Act. The Arbiter for Financial Services will not look into a complaint if the investor did not avail himself of the internal complaints handling mechanism of the Company, or the complaint is being or has already been decided by the courts, or any consumer complaints mechanism set up under the laws of Malta or elsewhere.

In addition to the above, the Arbiter for Financial Services will only consider a complaint when it appears that:

- a) The Company has rejected a complaint and informed its customer accordingly; or
- b) The Company has offered a settlement, which has been rejected by the complainant or
- c) The Company has not responded to the customer's complaint within 15 working days from receipt.

Each case the Arbiter for Financial Services takes is considered impartially, on its own merits, after discussion with the parties concerned. The Arbiter for Financial Services does not automatically take the side of either the consumer or the financial entity.