

# Complaints Policy & Procedures

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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

This Complaints Policy and Procedures are published on MCM's website. Details include information about the complaints, management policy and the contact details for the complaints management function. This Complaints Policy and Procedures 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 Compliance Department. The Compliance Department will then analyze the complaint.

The Compliance Department 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.<sup>2</sup> Clients and potential clients can submit complaints to MCM free of charge.

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<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 (100 F St NE, Washington, DC 20549) registered investment advisor, a CFTC (535 W. Monroe Street, #1100, Chicago, Illinois 60661) registered CTA and a member of the NFA (Riverside Plaza, Suite 1800, Chicago, IL 60606). MFIUK is authorized and regulated by the FCA (12 Endeavor Square, London, England E20 1JN).

<sup>2</sup> Clients located in Switzerland may refer complaints regarding Swiss Financial Services Act services to the Swiss Chambers' Arbitration Institution ("SCAI"). SCAI's website is [www.swissarbitration.org](http://www.swissarbitration.org) and it is located at Boulevard du Théâtre 4, 1204 Geneva, Switzerland.

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## 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, 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 Department is responsible for recording each complaint received and the complaint remedy (if any). The Compliance Department 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. A representative from the Compliance Department and MCM's senior management discuss any complaints received and their outcomes.

## Contact Information

Mesirow  
Attention: Compliance Department  
353 North Clark Street  
Chicago, Illinois 60654  
312-595-6000  
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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