

Complaints Procedure

How to complain and how Passion Capital will respond

Passion Capital Investments II LLP (“Passion Capital”) (FRN 760022) is authorised and regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom to manage venture capital funds and related assets. Passion Capital is required to have in place effective and transparent procedures for the reasonable and prompt handling of complaints in relation to its services. Accordingly, this document sets out the complaints handling procedures that Passion Capital will follow in the event that you make a complaint.

Does this policy apply to you?

Passion Capital’s services have historically been made available to persons who are ‘consumers’ through the legacy Conviction VC brand, as well as individuals, businesses and organisations that may not be consumers. The definition of a consumer for regulatory purposes refers to any natural person acting outside of their trade, business or profession and who has not opted out of consumer protections. If you fall within such category, you are likely to be an ‘eligible complainant’. Whilst Passion Capital will treat all complainants equally, please note that only eligible complainants will be able to refer complaints to the Financial Ombudsman Service (“FOS”) if you are not satisfied with the way that Passion Capital has handled your complaint.

How can you make a complaint?

You can make a complaint about Passion Capital’s services by any reasonable means – for example, letter, email or in person. It is free of charge to complain.

To make a complaint, please contact:

Name: Sarah Stafford

Entity: Passion Capital Investments II LLP

Address: Second Floor, Laxmi, The Tanneries, 57 Bermondsey Street, London SE1 3XJ

Email Address: sarah@passioncapital.com

What will happen once you have made your complaint?

Your complaint will be acknowledged, the name and title of the person handling your complaint confirmed, and a copy of this policy will be provided, in each case in writing promptly upon receipt. Your complaint will be reviewed by Robert Dighero, the Compliance Officer of Passion Capital unless Robert Dighero is involved in the subject matter of the complaint, in which case your complaint will be referred to another member of Passion Capital’s senior management team. Sarah Stafford and/or each other member of Passion Capital’s senior management team has the authority necessary to investigate and settle each complaint.

Investigating and resolving your complaint

Passion Capital will, within a reasonable period of time, investigate your complaint competently, diligently and impartially with a view to deciding whether the complaint should be upheld and whether any remedial action and/or redress may be appropriate. The conclusions of this investigation will be confirmed in a final written response to you.

If it is decided that redress is appropriate, Passion Capital will aim to provide you with fair offer of compensation for any acts or omissions for which Passion Capital is responsible. If you accept that offer, Passion Capital will provide such compensation to you within a reasonable period of time.

Timetable for responses

Once your complaint has been acknowledged, as set out in the section “What will happen once you have made your complaint?” above, Passion Capital will keep you reasonably informed of the progress of your complaint. If Passion Capital can quickly resolve your complaint, you will be sent a summary resolution communication which will:

- acknowledge your complaint and confirm that it is now considered to have been resolved;
- explain that you may still be able to refer your complaint to the FOS if you subsequently disagree with any decision made, and the timescales you have for doing this; and
- provide information about how to contact the FOS.

If it is not possible to resolve your complaint within a reasonable period of time, Passion Capital will, within eight weeks of receiving your complaint, send you either a final response or a written response that explains why it is not possible to make a final response to you and when you can expect to be provided with one.

Such response will also:

- inform you that, if you remain dissatisfied, you may refer the complaint to the FOS; and
- enclose a copy of, or an electronic link to, the FOS standard explanatory leaflet.

Financial Ombudsman Service

If you are an eligible complainant, you can refer a complaint to the FOS if you are not satisfied with the outcome of your complaint. Your rights are set out in the FOS’s leaflet entitled “Your Complaint and the Ombudsman” (<https://www.financial-ombudsman.org.uk/publications/ordering-leaflet/leaflet>) which Passion Capital will provide to you as part of the Complaints process. Please remember that if you wish to refer a complaint to the FOS, you must do so within six months of the date of our final response.

Closing complaints

Your complaint will be determined to be closed in the following circumstances:

- once Passion Capital has sent you a final response; or
- where you have told Passion Capital in writing that you accept an earlier response that it has sent to you; or
- if you refer your complaint to the FOS, when the FOS informs Passion Capital that the complaint has been closed.

Questions

If you have any questions about our complaints process, please contact Sarah Stafford via any of the contact methods listed above.