



LOMBARD ODIER
INVESTMENT MANAGERS

LOIM Group

Complaints Policy

ANNEXE FOR INVESTORS AND CLIENTS

Approval and review	Details
Document owner	Compliance
Approval authority	Policy & Documentation Committee
Approval date	11.12.2017
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Approval and amendment history	Details	
Original approval authority and date	Board of Directors	April 2015
Amendment authority and date	Policy & Documentation Committee	02.11.2015 07.02.2015 11.12.2017

Annex I: Information for investors and Clients

Complaints must be submitted in writing to

By Post	Lombard Odier Asset Management (Switzerland) SA for the attention of the Compliance Department 1213 Petit-Lancy Avenue des Morgines 6 Switzerland	Lombard Odier Asset Management (USA) Corp for the attention of the Compliance Department 452 Fifth Avenue, 25th Floor NY 10018 New York	Lombard Odier Asset Management (Europe) Limited For the attention of the Compliance Department 3 Old Burlington Street London W1S 3AB Queensberry House United Kingdom
By phone	T. +41 (0)22 793 06 87	T. +1 212 295 6200	T. +44 (0)20 3206 6000
By fax	F. +41 (0)22 709 29 20	F. +1 212 295 6220	F. +44 (0)20 3206 6250
By email	Loim.compliance.switzerland@lombardodier.com	Loim.compliance.usa@lombardodier.com	Loim.compliance.uk@lombardodier.com

Complainants may file their complaint in the official language(s) of their country of residence.

The complaint shall be supported by a statement of the reasons on which it is based together with, inter alia, the following documents:

- A detailed and chronological statement of the facts underlying the complaint and the steps already taken by the applicant;
- In the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that the person is legally entitled to act as such;
- [A copy of a valid ID document of the applicant (natural person) or, where the applicant is a legal person, of the natural person representing this legal person]

The written acknowledgement of receipt will be provided to the complainant within a period which shall not exceed 10 business days after receipt of the complaint, unless the answer itself is provided to the complainant within this period.

On a receipt of a Complaint, the Firm will

- Investigate the complaint competently, diligently and impartially, obtaining additional information as necessary;
- Assess fairly, consistently and promptly the subject matter of the complaint;
- Assess whether the complaint should be upheld
- Determine what remedial action or redress (or both) may be appropriate; and if appropriate, whether the Firm has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint; and
- Comply promptly with any offer of remedial action or redress accepted by the complainant

The Compliance Department is entrusted with the management of all complaints to ensure a thorough examination of the issues involved. LOIM will handle all complaints with the utmost diligence, transparency and objectivity and will communicate its decision to the complainant in writing within 30 calendar days of receipt of the complaint by registered mail with return receipt. All relevant data is logged in the Complaint Register.

In the absence of a response sent to the complainant within the set terms, or if the complainant is not satisfied with the resolution of the complaint, before resorting to a court the complainant may contact:

Lombard Odier Asset Management (Switzerland) SA	Lombard Odier Asset Management (USA) Corp	Lombard Odier Asset Management (Europe) Limited
Complainant may submit a complaint via the website of the Swiss Financial Regulator: FINMA https://www.finma.ch/en/finma-public/reporting-information/	Complainant may submit a complaint via the website of the Securities Exchange Commission (SEC) https://www.sec.gov/oiea/Complaint.html	Complainant may submit a complaint via the website of the Financial Ombudsman Service (for Eligible complainants) http://www.financial-ombudsman.org.uk/consumer/complaints.htm

Annex II: Compliance function responsible for the handling of complaints and communication of information at the request of the public or competent authorities

Entity	Name
Lombard Odier Asset Management (Switzerland) SA	Nicolas Ristic
Lombard Odier Asset Management (Europe) Limited	Fidelis W. Wangata
Lombard Odier Asset Management (USA) Corp	Laura Keeler