GMO

GMO Singapore Pte. Limited[1]

Complaints Handling Process
Last Revision: June 24, 2026

I. Purpose

The purpose of this document is to set out the process for the handling of complaints received by GMO Singapore Pte Limited ("GMOS") from its clients.

II. Scope

This document applies to all staff and representatives of GMOS. This document applies to all complaints received by GMOS from all clients (both separate account clients and clients invested in GMO products). A complaint is any expression of unresolved dissatisfaction to GMOS by a client together with a request that their complaint be resolved.

III. Obligations

GMOS is the holder of a Capital Markets Services License ("CMSL") issued under the Securities and Futures Act 2001 (Cap. 289) (the "SFA"). GMOS is also an Exempt Financial Adviser under the Financial Advisers Act 2001 (Cap. 110) (the "FAA"). This document takes into account GMOS's obligations under the SFA, the FAA[2], and the Monetary Authority of Singapore ("MAS") Guidelines on Fair Dealing – Board and Senior Management Responsibilities for Delivering Fair Dealing Outcomes to Customers [FSGA-G04].

This Complaints Handling Process will help to ensure that GMOS has in place adequate procedures and processes for handling complaints independently, effectively, and promptly. GMOS is also subject to the GMO Client Complaint Policy and Procedures. All staff and representatives of GMOS must meet the requirements in both this Complaints Handling Process and the GMO Client Complaint Policy and Procedures.

IV. Application

Generally, this process will be followed in relation to all complaints received by GMOS from its clients. It may not be appropriate to apply all aspects of this process in some circumstances. For example, where the investment management agreement with a separate account client describes a particular dispute resolution process to be followed that process must be used.

[1] UEN 20-0301509-R
CMSL No: CMS 100016

[2] The Financial Advisers (Complaints Handling and Resolution) Regulations 2021 ("FA(CHR) 2021") came into effect on 3 January 2022 and sets out requirements for financial advisory firms (including licensed and exempted financial adviser) in relation to the handling of complaints from individuals that are not accredited, export or institutional investors. As GMOS does not deal directly with such investors, the FA(CHR) 2021 and its requirements do not apply to GMOS. Nevertheless, certain aspects of the FA(CHR) 2021 have been reflected in this process.

V. Process

A. Receiving complaints

Complaints may be made by email, verbally by phone or in person, or in writing.

In most cases, the recipient of complaints will be a member of the GMO Singapore Global Client Relations team ("Client Relations"). In situations where this is not the case, the complaint, once received, must be forwarded to the member of Client Relations that manages the relationship with the complainant. Client Relations is the initial contact point for the receipt of complaints and is responsible for managing the complaint handling process and for ensuring that a response is provided to the complainant within the required timeframes.

Client Relations must notify the Asia-Pacific Legal & Compliance team ("Legal & Compliance") and GMO Singapore's Executive Director (Cindy Tan) promptly upon the receipt of a complaint. In addition, a copy of any complaint must be sent immediately to the following GMO LLC personnel:

- Chief Compliance Officer (CCO) – Greg Pottle
- FDI Supervising Principal - Matt Muskrat
- Head of Global Client Relations – Alex Bark
- Chief Executive Officer (CEO) – Scott Hayward
- GMOS Chief Compliance Officer – Mark Landis

GMOS aims to acknowledge the receipt of a complaint to the complainant promptly or at least within 2 working days of receipt.

B. Investigation of complaints

GMOS will act in good faith when investigating any complaint. Where appropriate, Client Relations, in consultation with Legal & Compliance, will investigate the complaint with input from other departments as relevant to the complaint.

Each department must assist Client Relations to investigate and respond to the client within the required timeframes.

C. Response to complaints

Unless circumstances warrant otherwise, Client Relations, in consultation with Legal & Compliance, will generally respond to the complainant.[3]

A response must generally be provided to the complainant within 20 business days of receiving the complaint. If a response is in writing it must include the reasons for the decision and, if relevant, information regarding further avenues of complaint, including FIDReC (see section D). The written response must be reviewed by Legal & Compliance and approved by a Director of GMOS before being provided to the complainant.

[3] In certain circumstances, it may be appropriate for the response to come from a Director of GMOS, Legal & Compliance, and/or other appropriate representative.

If the complaint cannot be resolved within 20 days of receipt, the complainant must be advised in writing of the reasons for the delay, and Legal & Compliance must be advised.

D. Referral of complaints to FIDReC

GMOS is a member of the Financial Industry Disputes Resolution Centre Ltd ("FIDReC"). FIDReC is an independent and impartial institution specialising in the resolution of disputes between financial institutions and consumers. FIDReC was initiated by the financial sector to make its services more professional, transparent, customer focused and service oriented.

Any response or communication with FIDReC regarding a complaint must be reviewed by Legal & Compliance before being sent.

E. Recording information about complaints

Client Relations must enter each complaint received in a register of complaints. The register must include the following details:

- date the complaint was received;
- name of complainant,
- description of complaint;
- dates of all correspondence (verbal and written) with the complainant regarding the complaint;
- outcome of complaint; and
- date finalised.

Legal & Compliance are responsible for ensuring that the complaints register is maintained and is up to date. All records in relation to the complaint must be kept for at least 5 years after the date on which the complaint is deemed to be resolved.

F. Reporting and identifying systemic issues

Legal & Compliance are responsible for reviewing the complaints register to identify any systemic issues. If any systemic issues are identified Legal & Compliance will investigate the cause and advise the appropriate rectification action to implement.

Legal & Compliance must provide a summary of any complaints received to each meeting of the GMOS Board. Legal & Compliance must also report any systemic issues that have been identified.

VI. Related policies

The following GMO policy is relevant to the operation of this policy:

- GMO Client Complaint Policy and Procedures

VII. Further information

Any questions in relation to the operation of this process should be directed to Legal & Compliance.

VIII. Training

All employees must attend and complete any training as provided by GMO Singapore from time to time and ensure that they familiarise themselves with the GMOS Complaints Handling Policy as amended from time to time.

IX. Update and review

This policy has been approved by the Board of GMOS. Legal & Compliance must ensure that the policy and procedures in this document are reviewed periodically to assess their effectiveness, and updated as needed. Material changes to the policy must be approved by the GMOS Board. Non-material changes to the policy may be approved by Legal & Compliance.