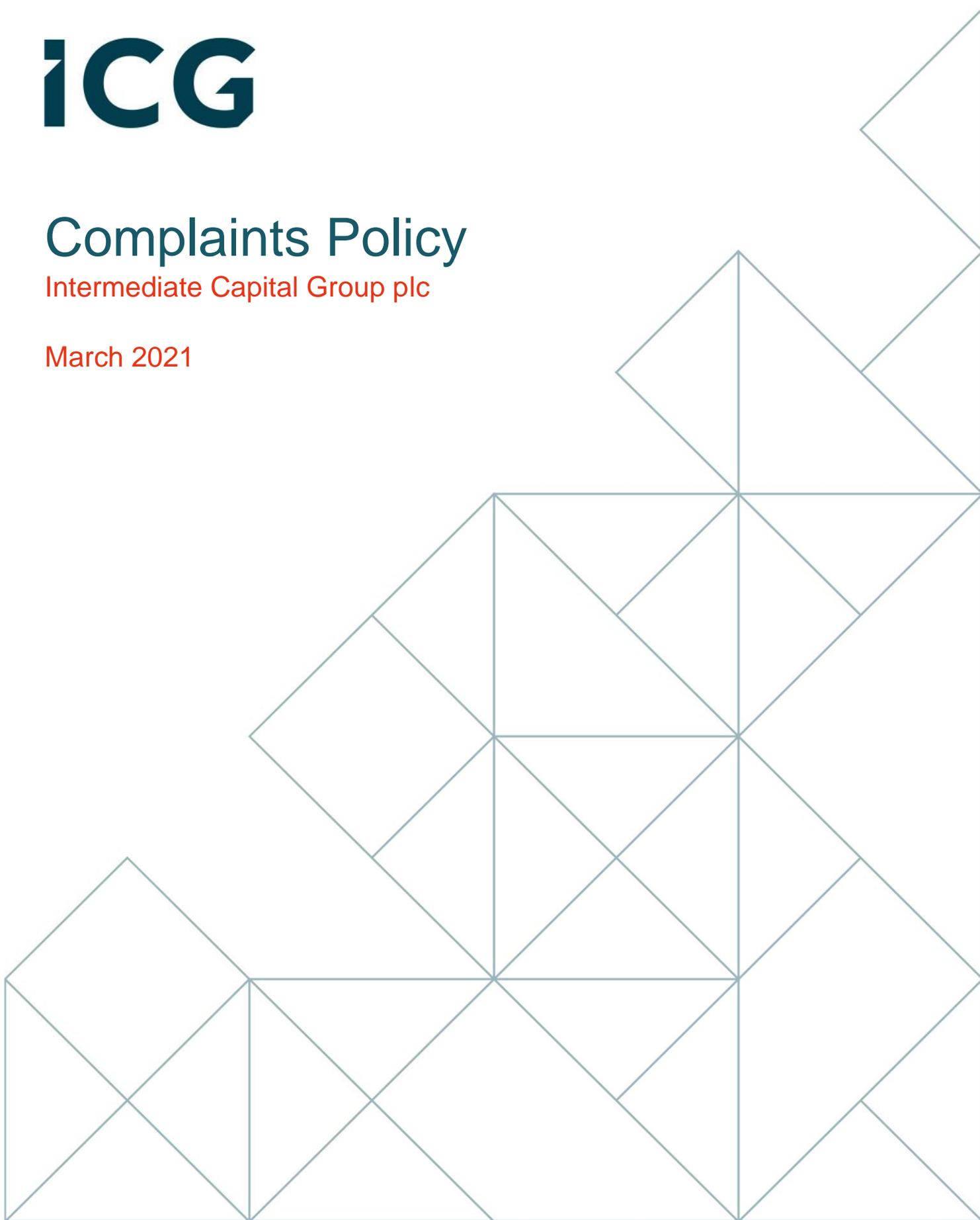




Complaints Policy

Intermediate Capital Group plc

March 2021



**INTERMEDIATE CAPITAL GROUP PLC,
INTERMEDIATE CAPITAL MANAGERS LIMITED and
ICG ALTERNATIVE INVESTMENT LIMITED**

Complaints

A complaint is any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of, a Client regarding the provision of, or failure to provide, a financial service.

All complaints received from a person, an ICG Fund, an underlying investor in an ICG Fund or a segregated (or potential) mandate client (together, "Clients") will be reviewed objectively and any complainant treated fairly.

ICG Group and its affiliates ("ICG") takes all complaints seriously and this Policy outlines the steps ICG will take in managing complaints from potential, actual or former Clients.

Contacts

ICG Compliance is responsible for the management and oversight of complaints at ICG.

You may make your complaint by letter at:

Intermediate Capital Group plc

Procession House
55 Ludgate Hill
London, EC4M 7JW

Attn: Head of International Compliance

Alternatively, you may submit the complaint verbally by contacting Compliance on

+44 (0) 203 201 7700

You do not need to make the complaint in writing, but it would help our investigation if you could set all the details clearly in your communication.

ICG does not charge a complaint handling fee.

Acknowledging your complaint

ICG will promptly acknowledge your complaint in writing. In this acknowledgement ICG will provide the name and title of the person within ICG who will handle your complaint.

This individual will have the authority necessary to investigate the complaint and will be independent of the circumstances of the complaint.

Investigating complaints

Your complaint will be investigated, by the individual identified in the acknowledgement ICG will send to you, in a competent, diligent and impartial manner.

Certain telephone lines within ICG are recorded and may be used to assist in the investigation of any complaints.

ICG will keep you informed of the progress of the complaint.

Resolving Complaints

Once ICG has concluded its investigation, a full and clear response will be provided to you without any unnecessary delay and will include details of your options. The response will set out whether ICG has upheld the complaint and whether remedial or redress (or both) are appropriate. When you accept an offer or redress or remedial action, ICG will promptly comply.

Record Keeping

ICG is required to keep detailed records of all complaints and the measures taken to resolve them. Such records will be retained for 5 years from the date of resolution of the complaint.

Financial Ombudsman Service (for UK affiliates)*

ICG's regulatory Clients are limited to professional clients and eligible counterparties who are not eligible to appeal to the UK Financial Ombudsman Service.

* For Luxembourg domiciled products or products managed out of Luxembourg, investors still have the opportunity, should they consider their complaint has not been addressed satisfactorily, to reach out to the CSSF following the provisions of the CSSF Regulation 16-07. In such a case, ICG and/or any of its affiliates involved will provide the necessary cooperation to the CSSF to help the Commission draw their recommendation or conclusion.