


# SWIP / SUPPLEMENTARY INFORMATION DOCUMENT

This document provides supplementary information relating to your investment in one or more of the Funds for which SWIP Fund Management Limited or SWIP Multi-Manager Limited acts as the Authorised Corporate Director or Manager. (SWIP Fund Management Limited and SWIP Multi-Manager Limited are referred to in this document as "we" or "us".) This document should be read in conjunction with the Key Investor Information Document ("KIID") for the relevant Fund.

## Can I change my mind?

If you received financial advice, you will normally receive a cancellation notice. This gives you the right to cancel your original investment up to 30 days after you receive the notice. If you wish to exercise this right, please send your request to us at the address on the cancellation notice. Once we receive it, we will give you your money back, less any fall in the investment's value. This amount is calculated using the next price released after we receive your notice.

## How to complain

If you need to complain, firstly contact us at SWIP Fund Management Limited/SWIP Multi-Manager Limited, BNY Mellon House, Ingrave Road, Brentwood, Essex, CM15 8TG

**Tel:** 0800 33 66 00

We will provide you with a copy of our complaints handling pack and we will investigate your complaint and provide you with a substantive response.

If you are not satisfied with the response, you have the right to refer your complaint to;

The Financial Ombudsman Service
South Quay Plaza, 183 Marsh Wall,
London, E14 9SR

**Tel:** 0800 023 4567
**E-mail:** complaint.info@financial-ombudsman.org.uk
**Website:** www.financial-ombudsman.org.uk

Complaining to the Ombudsman will not affect your legal rights.

## Compensation

If you make a valid claim against us and we are unable to meet our liabilities with you, you may be entitled to payment from the Financial Services Compensation Scheme. established under the Financial Services and Markets Act 2000. The maximum level of compensation you can receive for investment business is £50,000. Further information about the compensation arrangements is available from the Financial Services Compensation Scheme on 0800 678 1100 or on their website at www.fscs.org.uk.

## Money laundering regulations

Under these regulations, there is a requirement to prove the identity of people who wish to take out an investment contract. You may therefore be asked to supply documents as evidence of your identity and your address. Please see the application form for further details.

## Client money

In exceptional circumstances, where it is not possible for shares to be allocated to you following receipt of your investment instruction, or where it is not possible to send money to you for any redemptions, money will be transferred to a client money bank account pending completion of the transaction. This money will be held in accordance with the Financial Conduct Authority (FCA)'s client money rules. By segregating the money in a client money




bank account from our own capital, this has the effect of protecting investors should we become insolvent during this pending period. No interest will be paid on money held in these client money bank accounts.

In the event that there has been no contact from you for 6 years, despite our reasonable attempts to contact you, any money held for you in a client money bank account will cease to be treated as client money. Should you subsequently contact us and make a valid claim, we will reimburse the money to you. No interest will be due on this money.

## Conflicts of interest

In line with FCA requirements, we operate a Conflicts Policy. This policy sets out how we, and other companies within our Group, must identify and then manage all material conflicts of interest. Conflicts of interest can arise in our day to day business activities. Examples of conflicts of interest are: where one of the clients managed within the Group could make a gain at the direct expense of another client; or one of the companies within our Group is faced with an opportunity to make a gain but this would be to the direct disadvantage of one or more other clients.

Depending on the exact nature of the conflict of interest involved, we must take certain actions in line with our Conflicts Policy to soften the potential impact of the conflict. If the actions which we take to mitigate the impact of the conflict are insufficient to prevent a potential material risk of damage to clients then we will disclose the general nature and/or source of those conflicts to you before we undertake the relevant business.

If you wish to have further information on the Conflicts Policy, or on any specific conflict of interest that you think might affect you, please contact us.

## Commission sharing arrangements

SWIP, as investment adviser of the Funds, has entered into commission sharing arrangements with certain third party brokers. In some circumstances, a broker paid out of a Fund's assets may agree to split its remuneration with a third party. As a result of the commission sharing arrangements, the third party may meet certain expenses that should normally be paid for out of the assets of the Fund.

## Law and language

For legal purposes the law of England and Wales will apply to dealings in shares. We will communicate with you in English.

## How to contact us

If you have any questions at any time please contact us by:

**Telephone:** 0800 33 66 00

(Monday to Friday 8:30am and 5:30pm UK time).

We may record and monitor calls to help us improve our service.

**Address:** SWIP Fund Management Limited/SWIP Multi-Manager Limited, BNY Mellon House, Ingrave Road, Brentwood, Essex, CM15 8TG.

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Telephone calls may be monitored or recorded.

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