

Canadian Quebec Complaints Processing and Dispute Resolution Policy

July 2025

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Purpose

As a Financial Intermediary under the supervision of the Autorité des marchés financiers (AMF), Baillie Gifford is committed to handling complaints fairly, transparently, and efficiently.

A “financial intermediary” means a person or partnership registered as a firm, independent partnership or independent representative under the Act respecting the distribution of financial products and services and a person registered as a dealer or adviser under the Derivatives Act or the Securities Act.

This policy aligns with the Regulation respecting complaint processing and dispute resolution in the financial sector, effective July 1, 2025, ensuring we meet our client obligations, maintain trust, and foster continuous improvement in our services.

How this policy embodies 'Our Shared Beliefs'

Our clients come first

We act with integrity, judging our actions and intentions through the eyes of our clients. We strive for excellence across all areas of the firm and every contribution plays a role in developing trusted long-term partnerships with our clients.

Scope

This policy applies to all Baillie Gifford staff and operations involved in receiving, processing, and resolving complaints related to our financial intermediary services.

Definitions

Complaint: A written or verbal expression of dissatisfaction or reproach about a product or service offered by Baillie Gifford, made by a client or their representative, requiring action beyond simple correction of clerical errors or access requests under privacy laws.

Complainant: A client or their authorised representative lodging a complaint.

Policy Statement

We will process complaints diligently, in plain language, and within the timelines set by the AMF, ensuring clarity, assistance, and thorough documentation. Baillie Gifford's goal is to resolve issues effectively while identifying recurring concerns to enhance our services.

Roles and Responsibilities

We will use clear, readable language in all complainant interactions and escalate complaints to the Complaint Officer as needed.

The Complaint Officer is James Easton, the Canadian Chief Compliance Officer (CCO). The CCO oversees complaint receipt, processing, resolution, and record-keeping and reports to senior management quarterly.

We review complaint trends and ensures policy compliance, supported by governance groups like Group Compliance Committee and the Baillie Gifford Overseas board.

Complaint Handling Procedure

How do I complain?

If you have not already done so and wish to make a complaint to Baillie Gifford, you can telephone our Client Relations Team on 0800 917 2113 or +44 (0)131 275 3499 if calling from overseas. Please see further information on page 3.

What information should I provide?

As well as outlining your complaint and any action you would like us to take, it would be useful if you could include any account reference numbers you have and a contact telephone number or email address. If you are writing to us, it would be helpful if you could write 'complaint' at the top of your letter. Send copies of any relevant documents, but hold on to original documents.

You may also use the complaint form provided by the AMF on their website to make your complaint: [Complaint Form](#).

Processing Complaints:

1. We will assign each complaint to the Complaint Officer or Delegate promptly for review.
2. We will provide a written acknowledgement of receipt within 10 calendar days of receipt with: record identification code, date received, means to obtain information on the processing of the complaint, expected time frame for processing and link to summary of complaint policy.
3. We will investigate diligently, seeking to understand the intent.
4. Should your complaint involve other financial institutions or intermediaries, we will inform you of the extent to which they are involved and inform you of your right to file a separate complaint in respect of those institutions or intermediaries.
5. We will maintain a complaint record for 7 years, accessible for AMF review with:

date received, complainant details, nature of issue, actions taken, and outcome.

Complaint affecting other clients

Should our analysis of a complaint determine that it may have repercussions for multiple clients, we will take measures to rectify the situation for all our clients.

Resolution and Response:

We will provide a final written response within 60 calendar days of receipt, detailing findings, resolution (if any), and AMF dispute resolution options if unresolved.

If delays exceed 60 days, we will document reasons and notify you the complainant of the delay and expected timeline. In such cases, we will provide a final response as soon as possible but no later than within 90 calendar days of receipt.

Should an agreement be reached, we will give effect to the offer within the 30 calendar days following the acceptance of the offer.

Simplified Complaints Process

We may follow a simplified process for certain complaints. This process is used for complaints that we can resolve within 20 calendar days.

We consider a complaint to be resolved to the satisfaction of the client when the client accepts our proposed solution to their complaint or when the explanations we provide are sufficient to resolve the complaint.

Under this process, complaints may be referred to a member of our client relations team. In addition, a written acknowledgment of receipt or written final response does not have to be sent to the client. The person that handles the complaint can process it verbally.

The person who processes the complaint must: inform the client that their complaint has been received and that they have the right to request to have their complaint record transferred to the AMF within 10 calendar days, provide the complainant with our response and the proposed solution to their complaint within 20 calendar days.

These exchanges may be summarized in a document placed in the complaint record. The record will also include the information used in processing and resolving the complaint.

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Should the complaint not be resolved within the 20 calendar days, we will send the complainant a notice before the end of the 20-day period.

AMF dispute resolution

Should you the complainant request to have the AMF examine the complaint record, we will provide a copy of said record within 15 calendar days following receipt of complainant's request.

Record-Keeping:

We will log all complaints in a secure register, including: date, acknowledgement of receipt, complainant ID (anonymized), issue summary, all documents required for the analysis of the complaint, resolution status, and final response date.

Continuous Improvement

The Complaint Officer will analyse complaints quarterly to identify common causes, reporting findings to senior management and governance groups such as Group Compliance Committee.

Actions to address recurring issues will be implemented and tracked.

Non-Compliance

Breaches of this policy may lead to disciplinary action and AMF penalties via the Financial Markets Administrative Tribunal (e.g., fines up to \$5,000), which we aim to avoid through diligent adherence.

Contact

Please Email

InstitutionalComplaints@bailliegifford.com

To send a letter of complaint to Baillie Gifford, please use the following address:

Client Relations Team

Calton Square, 1 Greenside Row

Edinburgh, EH1 3AN,

United Kingdom

Phone: **0800 917 2113 (UK)** or **+44 (0)131 275 3499 (International)**

AMF Dispute Resolution: 1-877-525-0337 or www.lautorite.qc.ca.

Date	Comments	Material change	Regulatory requirement
July 1, 2025	Policy created in line with regulation	Yes	Yes

EMPLOYMENT SCOPE

EMPLOYEE TYPE	DEFINITION	IN SCOPE
EMPLOYEE	EMPLOYEE	x
PARTNER	PARTNER	x
FIXED TERM	EMPLOYEE	x
TEMPORARY AND AGENCY STAFF	CONTINGENT WORKER	x
INTERNS AND SUMMER STUDENTS	EMPLOYEE	x
SECONDEES	EMPLOYEE	x
INDIVIDUALS PROVIDING SERVICES VIA PERSONAL SERVICE COMPANIES	CONTINGENT WORKER	x
CONTRACTORS (WITH OR WITHOUT SYSTEMS ACCESS)	CONTINGENT WORKER	x
INDEPENDENT NON-EXECUTIVE DIRECTORS OF BG ENTITIES	CONTINGENT WORKER	x
NON-EXECUTIVE DIRECTORS OF MUBG	CONTINGENT WORKER	x
STAFF PENSION SCHEME TRUSTEES	CONTINGENT WORKER	x

ENTITY SCOPE

ENTITIES	ACRONYM	IN SCOPE
BAILLIE GIFFORD & CO	BG&Co	
BAILLIE GIFFORD & CO LTD	BG&CoLtd	x
BAILLIE GIFFORD OVERSEAS LTD	BGO	x
MITSUBISHI UFJ BAILLIE GIFFORD ASSET MANAGEMENT LIMITED	MUBG	
BAILLIE GIFFORD INTERNATIONAL LLC	BGI	x
BAILLIE GIFFORD FUNDS SERVICES LLC	BGFS	
BAILLIE GIFFORD ASIA (HONG KONG) LTD	BGA(HK)	
BAILLIE GIFFORD INVESTMENT MANAGEMENT (EUROPE) LTD	BGE	
BAILLIE GIFFORD INVESTMENT MANAGEMENT (SHANGHAI) LTD	BGIMS	
BAILLIE GIFFORD OVERSEAS INVESTMENT FUND MANAGEMENT (SHANGHAI) LTD	BGQS	