

Policy: Complaints Handling

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COMPLAINTS HANDLING POLICY

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1 PURPOSE

The Complaints Handling Policy (hereinafter “the Policy”) aims to ensure the reasonable and prompt handling of complaints received from investors.

2 DEFINITION

Andbank Asset Management Luxembourg (hereinafter “AAML”) defines a complaint as “an expression of at least one of the three following elements”:

- The dissatisfaction with the general level of service provided by the participants of the Fund (central administration: administrative agent, transfer agent, custodian, management company, domiciliary agent, investment manager/adviser, distributor, initiator, Broker, Swiss Representative, Paying agent, Business introducer, IT services, Third party marketers, Depositary or DPM Insurance Companies. etc...),
- The identification of an actual or potential harm;
- The claim of a remedy or compensation.

3 HOW TO RAISE A COMPLAINT TO AAML

A complaint can be addressed to AAML in writing by post or by email to the following addresses:

- **By email:**

complaints@aaml.lu

- **By post:**

Andbank Asset Management Luxembourg

Attn. Alexandre Trinel

4 Rue Jean Monnet

L-2180 Luxembourg

Grand-Duchy of Luxembourg

- **By Phone call:** A phone call to any employee of AAML can register a complaint if the complainant requests so

The complainant can file, **free of charge**, his/her complaint in any of the official Languages of Luxembourg as well as in English.

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REF: LUXAM-POL-009-V.3.6

A complaint should, as a minimum, include the following:

- A clear identification of the person/party filing the Complaint (please provide the name under which the complainant is listed under the shareholders register or the name of the intermediary acting on behalf of the complainant);
- A detailed explanation of the facts (issue or transaction) at the origin of the Complaint;
- Outline in detail any losses that may have occurred (Financial losses caused by delays or reputational losses)
- A copy of all related/necessary supporting documents;
- Communication preference (post, email) and respective contact details.
- Confirmation that the person has not (/or that the person he/she represents has not) submitted the claim to a court, an arbitrator or another out-of-court dispute resolution body, in Luxembourg or abroad.
- Confirmation that the person has not (/or the person he/she represents has not) submitted the claim to the CSSF or his/her local markets supervising body related to the same complaint.

4 PERSON RESPONSIBLE FOR COMPLAINTS HANDLING

One person of the management of the Company shall be appointed as the person in charge of the client Complaint handling process and shall be in charge of the communication with the CSSF.

This person has the overall responsibility for complaints received by AAML, in charge of coordinating the handling of client Complaints addressed to the Company and also in charge of making sure that the conducting officers of the AAML and the Compliance Officers obtain information on an ongoing basis of received Complaints.

In this respect, AAML has designated the Conducting Officer Mr. Alexandre Trinel as responsible for the handling of complaints and he has the overall responsibility for complaints received by the Company.

5 COMPLAINTS HANDLING PROCEDURE

The written **acknowledgement of receipt** will be provided to the complainant **within** a period which shall not exceed **10 business days**, following the receipt of the complaint, and specifying the name and contact details of the person handling his/her complaint.

AAML undertakes to **provide the complainant with an answer within one month** from the date of receipt of the complaint. Where an answer cannot be provided within this period, AAML will inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

AAML will inform the complainant of the follow-up of his/her complaint.

6 COMPLAINTS REGISTER

AAML undertakes to establish and maintain a complaints register available at its premises, including all written customer complaints and AAML's written responses thereto. All contact between the complainant and the responsible for the handling of complaints should be documented and maintained on file. Each complaint will be maintained for at least 5 years after the resolution of the complaint.

7 CSSF OUT OF COURT RESOLUTION OF COMPLAINTS

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The CSSF is the relevant authority for receiving complaints from customers of financial professionals under its supervision and for intervening with those professionals with the aim of settling those complaints amicably.

Where the complainant did not receive an answer or satisfactory answer within one month, s/he may file his/her request with the CSSF within one year after s/he filed his/her complaint with the professional. The request shall be filed with the CSSF in writing, by post or by fax, by email, or online on the CSSF website. The request shall be filed in Luxembourgish, German, English or French.

As described in the CSSF Regulation 16-07, Art 4, the following requests are not considered admissible by the CSSF:

- the complaint has been previously or is currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad;
- the complaint concerns business policies;
- the complaint concerns a non-financial product or service;
- the request is unreasonable, frivolous or vexatious;
- the complaint has not been previously submitted to AAML in accordance with Article 5(1) of the CSSF Regulation 16-07;
- the complainant has not filed a request with the CSSF within one year after s/he filed a request with AAML;
- the request handling would seriously impair the efficient functioning of the CSSF.

Details regarding the out-of-court resolution can be found on the CSSF website www.cssf.lu, under the section Consumer- Customer complaints.

8 CSSF COMMUNICATION

AAML undertakes to communicate to the CSSF annually within the defined regulatory deadlines the list of third parties authorised to handle complaints and the annual report on complaints.

9 ACCESS TO THE POLICY

The latest version of the Policy must be available to investors, **free of charge** either on the website of AAML or at AAML premises. In this respect, AAML must ensure that any updates to the Policy are always published on the AAML website without delay upon the approval from the Board of Directors.

10 LEGAL REFERENCES

- Law of 12 July 2013 concerning AIFM, as amended;
- Law of 17 December 2010 concerning UCITS as amended;
- CSSF Regulation No 16-07 of 26-Oct-16 relating to out-of-court complaint resolution;
- CSSF Circular 17/671 about specifications regarding CSSF Regulation No 16-07 of 26-Oct-16 relating to out-of-court complaint resolution;
- CSSF Circular -18/698

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- Regulation CSSF 10-04, Article 7;