

Handling of complaints



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Purpose

FundPartner Solutions (Europe) S.A. (hereafter “the Company”) is a management company governed by section 15 of the Luxembourg law of 17 December 2010 concerning undertakings for collective investments and a Luxembourg Alternative Investment Fund Manager governed by the Luxembourg law of 12 July 2013. The Company is subject to the prudential supervision of the Luxembourg financial services regulator, the *Commission de Surveillance du Secteur Financier* (the “CSSF”). The Company has adopted a complaints policy which complies with the regulatory requirements and provides a common, clear and precise understanding of the way in which the Company handles clients' complaints.

Regulatory context*

- Article 112 of the amended law of 17 December 2010 on undertaking for collective investment
- Article 7 of the CSSF Regulation 10-04
- CSSF Circular 18/698: Authorisation and organisation of investment fund managers incorporated under Luxembourg law
- CSSF Regulation 16-07 relating to the out-of-court resolution of complaints
- CSSF Circular 17/671: Specifications regarding CSSF Regulation No 16-07 of 26 October 2016 relating to out-of-court complaint resolution
- CSSF Circular 19/718: Adoption of the Guidelines on complaints handling for the securities (ESMA) and banking (EBA) sectors of 4 October 2018

How to complain

Definition of a complaint

A complaint is dissatisfaction expressed by (potential) clients or investors to recognise a right or to redress a harm resulting from a service provided by the Company.

How to submit a complaint

If they wish to express their dissatisfaction, (potential) clients or investors may submit complaints in writing, verbally or via electronic means by contacting:

- the Client Relationship Manager directly, or
- the TA Client Services of the Company
FundPartner Solutions (Europe) S.A.
15, Avenue JF Kennedy
L-1855 Luxembourg
T.A. Client Services
Phone: + 352 46 71 71 7665
Fax: +352 71 71 7667
Pfcs.lux@pictet.com

Type of information to be provided by the complainant

To ensure that the complaint is handled in the most appropriate manner, the information indicated below must be provided:

- Full name of the complainant
- The account number(s) involved, if any, or any other appropriate given reference
- Role of the complainant on the account (e.g. accountholder or representative of the client, lawyer, etc.)
- Contact details of the complainant
- Fund or sub-fund concerned
- Information pertaining to the complaint (detailed description of the facts underlying the complaint)
- Relevant document(s) and/or correspondence;
- Any other detail(s) of relevance regarding the complaint

How complaints are handled

Written acknowledgement of receipt

The complainant will receive an acknowledgement of receipt within a period not exceeding 10 business days after receipt of the complaint, unless the response itself is provided within this period. The acknowledgement of receipt will include the name and contact information of the person responsible for follow-up of the complaint.

Formal response

The Company will issue a formal response to the complainant within a period not exceeding one month from the date of receipt of the complaint. In cases where an answer cannot be provided within this period, the Company will inform the complainant of the reason for the delay and indicate the date by when it will be possible to handle the complaint.

Escalating a complaint

When the complainant has not obtained a response or satisfactory resolution at the level at which they submitted their complaint in the first instance, the complainant may contact the responsible for handling complaints, who will then handle the complaint with the assistance of the Compliance team. Where necessary, the responsible for handling complaints will contact the Management Committee of the Company and/or the Board of Directors of the fund.

- Contact details of the responsible for handling complaints:
FundPartner Solutions (Europe) S.A.
15, Avenue JF Kennedy
L-1855 Luxembourg
Mr Philippe Matélic
Tel.: + 352 46 71 71 7089

Out-of-court complaint-resolution procedure at the CSSF

Introduction

If the complainant still considers the response they have received is not satisfactory, they then have recourse to the out-of-court complaint-resolution procedure to have the dispute resolved.

Referral to the CSSF

The complainant must file the request with the CSSF within one year after the complaint has been filed with the Company. This request must be filed with the CSSF in writing, by post, by fax or by email (to the address/number available on the CSSF website). The request can also be submitted online on the CSSF website. To simplify the procedure for filing a request, the CSSF has published a form on its website: <http://www.cssf.lu/en/consumer/complaints/>

Admissibility of the requests

For an out-of-court complaint-resolution procedure to be opened by the CSSF, the following conditions must be fulfilled:

- The complainant must have previously sent the complaint in writing to the responsible for handling complaints, and
- The complainant must not have received a response or satisfactory resolution from the responsible for handling complaints within one month of the date on which the complaint was sent.

CSSF Regulation No. 16-07 relating to out-of-court complaint resolution

The rules applicable to requests for out-of-court resolution of complaints filed with the CSSF are explained in depth in CSSF Regulation No. 16-07 relating to out-of-court complaint resolution:

http://www.cssf.lu/fileadmin/files/Lois_reglements/Legislation/RG_CSSF/RCSSF_No16-07eng.pdf

Final provisions

Last review

Compliance, February 2020

Validation

Management Committee, February 2020

Board of Directors, March 2020