

COMPLAINTS HANDLING POLICY

Last Update: March 2025

I. Glossary

Term	Description
FUNDS AVENUE	Funds Avenue SA
IFM	Investment Fund Manager
Funds	Funds managed by FUNDS AVENUE (i.e. AIFs or UCITS)
AIF	Alternative Investment Funds
UCITS	Undertakings for Collective Investments in Transferable Securities
Client	If not explicitly specified, this term includes Funds managed by FUNDS AVENUE, as well as Investors in those Funds.
Directors	Members of the Board of Directors
Senior Management	Members of the Management Committee
Complaint	<i>Complaint filed with a professional to recognise a right or to redress a harm. To this extent, a simple information requests or explanations cannot be considered as complaint.</i>
Complainant	<i>Any natural or legal person having filed a complaint with a professional.</i>

II. Introduction

Funds Avenue S.A. (the “Company”) is subject to the supervision of the Commission de Surveillance du Secteur Financier (“CSSF”).

The Company has adopted a Complaint Handling policy for managing investor complaints in an effective manner.

The purpose of this procedure is to describe the system implemented within Funds Avenue S.A. (hereinafter “the Company”) to treat and manage complaints of investors, partners and other actors, in accordance with the legal and regulatory provisions in force.

Complaints can be issued at the attention of Funds Avenue, acting as Investment Fund Manager and/or to the Funds for which Funds Avenue acts as Investment Fund Manager.

In all circumstances, the Company will ensure that complaints are handled efficiently and professionally, in full compliance with the applicable regulatory timeframes.

III. Legal and regulatory framework

- Law of 17 December 2010 on undertakings for collective investment (UCI Law).
- Law of 12 July 2013 on alternative investment fund managers (AIFM Law).
- Law of 13 February 2007 on specialised investment funds (SIF Law).
- CSSF Regulation No 10-04 (consolidated version) transposing Commission Directive 2010/43/EU of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as

regards organisational requirements, conflicts of interest, conduct of business, risk management and content of the agreement between a depositary and a management company.

- CSSF Regulation 16-07 of 26 October 2016 on out-of-court complaint resolution.
- Amended Law of 10 August 1915 on commercial companies (Company Law).
- CSSF Circular 17/671 providing further details on CSSF Regulation 16-07 regarding out-of-court complaint resolution, as amended.
- CSSF Circular 18/698 on the authorisation and organisation of IFM which provides guidelines on governance, conflicts of interest management, and operational oversight.

IV. How to submit a Complaint ?

The Company is committed to providing high-quality service. However, if you believe that an issue requires our attention, you may submit a complaint - free of charge, in the official language or one of the official languages of your Member State.

How to submit a Complaint

Complaints can be submitted through the following channels:

By Mail:

Funds Avenue S.A.
Attn: Mrs. Lucie Fischbach
6, rue Dicks
L-1417 Luxembourg

By Email: lucie.fischbach@fundsavenue.com

We strive to ensure your satisfaction and encourage you to provide as much detail as possible regarding your complaint. If additional information is required, our team will contact you directly.

Escalation to the CSSF

If you have not received a satisfactory answer nor an acknowledgement of receipt within one month, you have the right to escalate your complaint to the CSSF.

This escalation must be initiated within one year.

Complaints can be filed with the CSSF through the following means:

1. **By filing in the** [online complaint form](#) **where all relevant document can be attached**

2. Or by sending the completed complaint form (PDF):

> **either by mail** - simple mailing, no registered letter required - to the following address:
Commission de Surveillance du Secteur Financier
Département Juridique CC
283, route d'Arlon
L-2991 Luxembourg

> **or by Email:** reclamation@cssf.lu

The terms and conditions for CSSF Out-of-Court complaints handling procedures can be found on their website: www.cssf.lu/en/customer-complaints/

V. Complaints handling framework

Role of the Complaints Handling Manager

Within the Company, Lucie Fischbach is the Conducting Officer responsible for the handling, centralisation and monitoring of complaints.

She is notably in charge of:

- Ensuring that all complaints, regardless of their nature or amount, are immediately addressed.
- Acknowledging receipt in writing **within 10 business days**, unless a resolution is provided within that period.
- Coordinating with relevant departments for an in-depth assessment.
- Gathering and analyzing all necessary information to provide an adequate response.
- Making sure that the response is written in clear and comprehensive language, includes a translation if necessary.
- Providing the complainant with a response **within one month** of receiving the complaint. If additional time is needed, the complainant must be informed of the reason for the delay and the expected resolution timeline

Approval and resolution timeline

- If a complaint is received by another employee, they must ensure that the Complaints Handling Manager is informed without delay.
- The final official response letter will be signed by two authorized signatories of the Company.
- If compensation is granted, the amount must be pre-approved by the management committee.
- All complaints will be handled in accordance with the Company's conflict of interest policy.
- The Company bears the responsibility of demonstrating that the required information was provided within the applicable timeframes.

Complaint Outcome

Several scenarios may arise following a response:

- **Complaint Resolved:** If the client is satisfied with the response, the original complaint and the response will be archived.
- **Complaint Unresolved:**
 - If the client finds the response unsatisfactory, the Company will provide a detailed explanation of its position.
 - The complainant may pursue the CSSF's out-of-court complaints procedure

Legal Representation

If a complaint escalates to legal proceedings:

- The Company will be represented by a management committee member, who will serve as the primary contact with legal authorities.
- All legal correspondence will be handled by the Complaints Handling Officer, in coordination with relevant departments.

Reporting

The Complaints Register is a centralized log used to record and track all complaints received by the Company. It includes key information such as:

- Date the complaint was received
- Name and contact details of the complainant
- Nature and description of the complaint
- Departments or individuals involved
- Actions taken and timeline of the resolution process
- Date of response and outcome
- Any compensation granted (if applicable)

The Complaints Register is updated in real time and reviewed regularly to ensure that all complaints are managed in accordance with the Company's policies and regulatory requirements. Access to the register is restricted to authorized personnel to ensure confidentiality and data protection.

The Complaints Register is regularly reviewed by the Management Committee and Board of Directors and submitted to the CSSF within five months following the end of the financial year of the Company. The following template is made available by the CSSF: <https://www.cssf.lu/en/Document/table-listing-the-claims-registered-by-the-professional/>

**Conclusion**

The Company is dedicated to providing a transparent, efficient, and professional complaint-handling process. The purpose is to ensure that client concerns are addressed fairly and in accordance with regulatory requirements.