



Intertrust Fund Management (Luxembourg) S.à r.l

Complaints handling policy

1. Purpose

Intertrust Fund Management (Luxembourg) S.à r.l (the “**Company**”) is a management company pursuant to Chapter 16 of the Law dated 17 December 2010 relating to undertakings for collective investments and is also an alternative investment fund manager pursuant to Chapter 2 of the Law dated 12 July 2013 relating to alternative investment fund managers.

The Company has adopted the Complaints handling policy (the “**Policy**”) following the requirements of the below regulations and circulars:

- > CSSF Regulation 16-07 relating to the out-of-court resolution of complaints,
- > CSSF Circular 17/671
- > CSSF Circular 18/698

The purpose of the Policy is to provide a set of principles and rules that must be adhered to while managing client complaints.

2. Scope

The Policy relies on each employee of the Company.

The Policy is part of the Intertrust Governance, Risk and Compliance Framework and the Company, as part of Intertrust Group, adheres to the same principles.

3. Definitions

For the purpose of this Policy a complaint is any **oral or written expression of dissatisfaction**, whether reasonable or not, from or on behalf of any person (the “**Complainant**”) in respect of the provision of, or failure to provide, a service that the Company has agreed to provide to such person and in respect of which some form of redress or remedy is sought.

4. Client Complaint Notification Procedure

A complaint can be submitted to the Company through different channels, namely:

- > Email to LU-AIFM@intertrustgroup.com (accessed by the senior management and team members of the AIFM)
- > Email to the client distribution list, members of the client servicing team or management
- > Telephone call to client servicing team or any member of the Management
- > Letter sent by fax or by post to: Intertrust Fund Management (Luxembourg) S.à r.l., Vertigo Naos Building, 6 Rue Eugène Ruppert, L-2453 Luxembourg



4.1 Acknowledgement:

If a complaint is received in writing, it must be acknowledged in writing no later than 24 hours by close of business on the day of receiving the complaint. The Complainant must be informed that the complaint will be dealt with in accordance with the Company's Complaints handling policy.

If a complaint is received by telephone, it must be acknowledged and the Complainant informed of the same day. Depending on the seriousness of the complaint, the Complainant might be asked to put the complaint in writing.

4.2 Resolution:

The Complaints Handling Officer or the assigned Responsible Party will contact the Complainant no later than 24 hours by close of business on the day of receiving the complaint to inform them that they will be responsible for the resolution of the complaint and that the Complainant can expect a response **within 7 to 21 days**.

5. Involvement of the CSSF as mediator

If the Complainant has not received a satisfactory answer nor an acknowledgement of receipt within one month as of the date when the complaint was sent to, the Complainant may submit a complaint to the CSSF **within one year** after having filed the complaint with the manager responsible for complaint handling. The detailed procedure for the out-of-court complaint resolution procedure with the CSSF can be found in <https://www.cssf.lu/en/customer-complaints/>.