

Unigestion (Luxembourg) S.A.

Complaints Handling Policy

Version 2.0

Document owner		Approver
Complaints Officer		Board of Directors

Version	Effective date	Change description	Author
1.0	February 2015	Creation for AIFM License Application	Akina (Luxembourg) S.A.
2.0	28 March 2018	Reshape of document structure and alignment with new operational set-up of Unigestion (Luxembourg) S.A. and incorporation of additional process specifications	Mario Koster

1. Introduction

Unigestion (Luxembourg) S.A. (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 this complaints policy, which provides a common, clear and precise understanding of the way in which the Company handles clients' complaints, including a clear definition of the roles and responsibilities of the different stakeholders. The purpose of this document is to implement procedures for managing client’s complaints which comply with the requirements of applicable laws and regulations, in particular with CSSF Regulation 16-07 (the “Regulation”) and CSSF Circular 17/671. This policy is reviewed at least on an annual basis.

2. Complaint definition

For the purpose of these procedures, a complaint is considered to be any expression of dissatisfaction either orally or written, justified or not, which is about the Company’s provision of, or failure to provide, a financial services activity. Complaints may be received directly by the Company or indirectly through any of its delegates or service providers.

3. Complaint filing, assessment and resolution

A complaint shall be submitted to the Company for the attention of the Company’s Complaints Officer. The complainant can also express a complaint to any other direct contact within the Company. The Company shall ensure that its employees, officers and directors promptly notify the Complaints Officer of any complaint received, including complaints received indirectly through delegates or service providers.

The complaints notification shall include the full name, contact details and position of the complainant. Furthermore, the notification shall describe the full case history and shall be accompanied by all necessary information, documentation and/or correspondence and any other details of relevance.

The complainant will receive an acknowledgement of receipt of the complaint, together with the name and contact information of the person in charge of its follow-up, no later than two (2) working days from the date of receipt. The Company is committed to provide an answer in relation to the complaint within ten (10) days from the date of receipt of the complaint. Where an answer cannot be provided within this period, the Company will inform the complainant of the delay and the date at which the answer is likely to be provided.

Complaints are taken seriously and handled in the best interest of the complainant with the required diligence, transparency and objectivity. The Complaints Officer ensures that complaints are answered in a plain and easily comprehensible language. Where the Company upholds a complaint, appropriate redress shall be considered (such as an apology or an amount of compensation due to the complainant). Potential compensations should be fair and reflect any acts or omissions for which the Company is responsible. The Company’s Board of Directors (the “Board”) must give its approval before a compensation can be offered.

A complaint is considered resolved when the complainant has indicated acceptance of the response. The acceptance may not be in writing, but positive feedback is required.

4. Referral to the CSSF

If within one month after having sent a complaint in writing to the Company the complainant has not received an answer or a satisfactory answer, the complaint is considered as admissible by the CSSF and the complainant can file a request for out-of-court complaint resolution with the CSSF. The request shall be filed in Luxembourgish, German, English or French.

Following instances are not considered by the CSSF as admissible requests:

- complaints that have been previously or are currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad,
- complaints that concern business policies,
- complaints that concern products or services of a non-financial nature,
- complaints that are unreasonable, frivolous or vexatious,
- complaints that have not been previously submitted to the Company in accordance with Article 5(1) of the Regulation,
- the complainant has not filed a request with the CSSF within one year after s/he filed a request with the Company,
- complaints which request handling would seriously impair the efficient functioning of the CSSF.

Once the CSSF has received a request that meets all the conditions, it will contact the Company's Complaints Officer. As soon as the CSSF is in possession of all relevant documents and information, it starts the review process and issues a reasoned conclusion within ninety (90) days as from the date the CSSF was in possession of all relevant documents and information. In case of highly complex files, the 90-days period can be extended by informing the complainant and the Company.

Further details regarding the out-of-court resolution including information regarding when the CSSF formally closes the procedure, can be found on the CSSF website (www.cssf.lu).

5. Monitoring and reporting

The Company shall ensure that all complaints received are analysed to identify whether they have arisen due to a systemic failure in processes or controls within the Company, its delegates or service providers. Appropriate actions shall be taken in case of identified deficiencies. Complaints are escalated as appropriate within the Company and ultimately to the Board during the assessment phase and upon resolution.

The Board is informed on a regular basis of all complaints received as regards to the complaints' nature, its background, its financial/legal/regulatory impact, the actions taken for its resolution and steps to prevent reoccurrence

The Complaints Officer submits a complaints report to the CSSF on an annual basis.

6. Record keeping

All complaints received by the company are maintained in a register (Complaints Register) and all correspondences and documentation in relation to complaints shall be forwarded and retained by the

Complaints Officer to ensure adherence to these procedures. The documentation and information relating to complaints are retained in line with regulatory requirements.

7. Contact details

Complaints or questions in relation to this policy should be directed to the Complaints Officer of the Company at the following address:

Benoit Paquay
Complaints Officer
Unigestion (Luxembourg) S.A.
5, Heienhaff
L-1736 Senningerberg