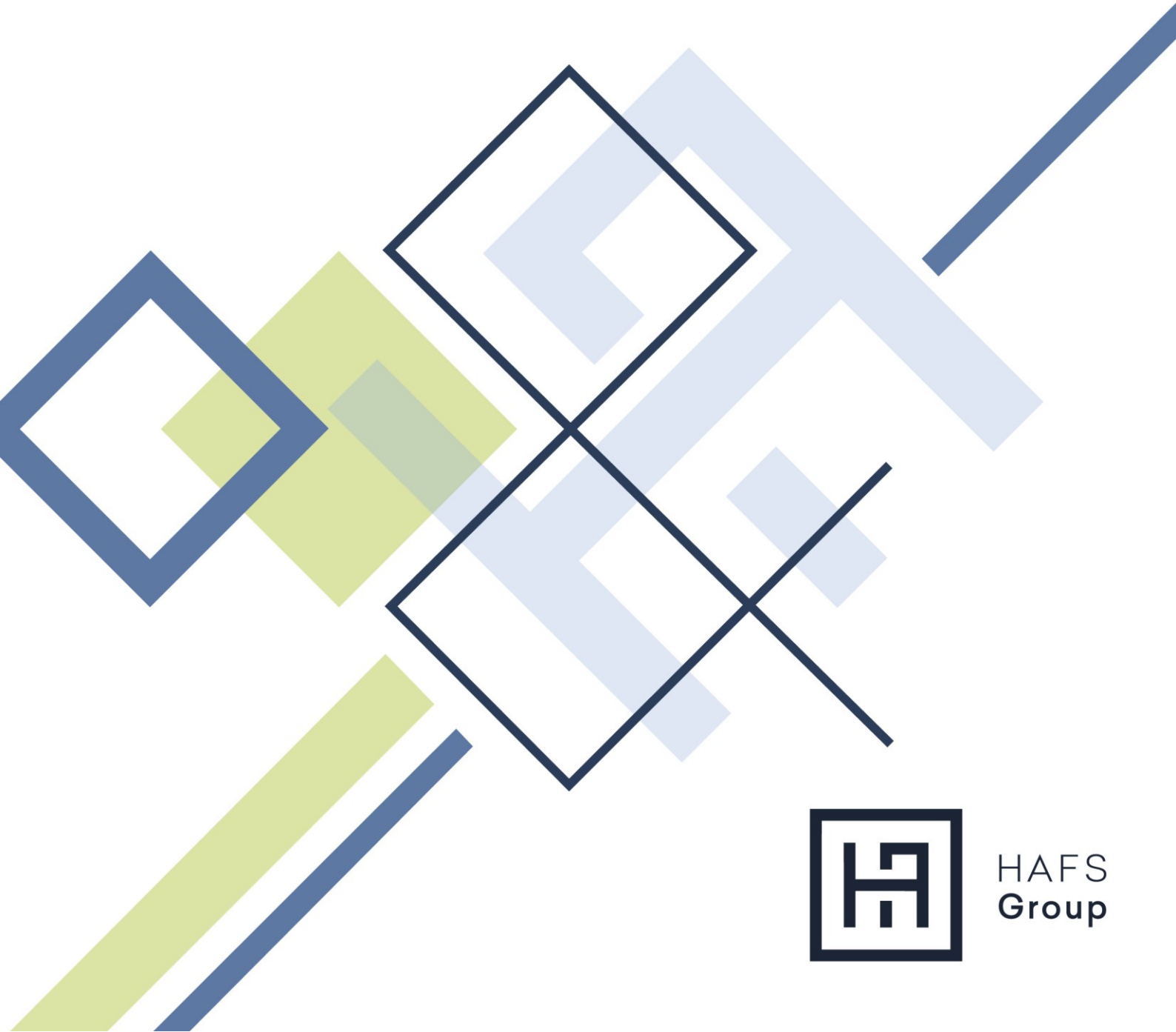


Complaint Management

Policy



HAFS
Group

Table of Contents

1	Objectives of the complaint management	3
2	Functions of the complaint management.....	3
3	What is a complaint?	3
4	Filing a complaint	3
5	Complaint processing.....	4
5.1	Acknowledgement of receipt.....	4
5.2	Interims notice	4
5.3	Response letter	4
6	Complaints officer.....	4
7	CSSF out-of-court complaint resolution procedure	4

1 Objectives of the complaint management

Complaint management aims to implement regulatory requirements for the organization of internal complaint processes. The objective is not only to ensure the necessary proper business organization as part of the complaint management process, but also to use the findings from customer complaints in particular to improve the proper business organization and thus achieve greater customer satisfaction.

Through constructive, transparent and efficient complaint processing, we ensure that customer satisfaction is restored and customer loyalty is strengthened. This principle follows the model below:

- Reliable registration and evaluation as well as immediate handling of complaints;
- Analysis of complaints regarding possible failings and inadequacies in business operations;
- Identification and elimination of risks and problems in current processes and products.

2 Functions of the complaint management

The complaint management

- is responsible for the proper recording, processing and response to complaints;
- takes the lead if various departments are involved in the processing of complaints;
- is responsible for internal reporting and reporting obligations to the CSSF.

3 What is a complaint?

A complaint in the supervisory sense is any complaint filed by a complainant with a financial services provider with the aim of establishing a right/claim or recognizing a claim for compensation. Simple requests for information or clarification, on the other hand, are not considered as complaints.

4 Filing a complaint

To simplify the submission, we provide a [complaint form](#). Complaints can be submitted to our complaints management team by post or email.

Postal address: Hauck & Aufhäuser Administration Services S.A.
Complaint Management
1c, rue Gabriel Lippmann
L-5365 Munsbach

e-mail: ComplaintHAAS@hauck-aufhaeuser.com

5 Complaint processing

All complaints submitted will be processed immediately by our complaint management as follows:

5.1 Acknowledgement of receipt

An acknowledgement of receipt will be issued for all complaints as part of the complaint recording process and provided to the complainant in writing (by mail, fax or e-mail) within a period not to exceed ten (10) banking days from the date the complaint is received by complaint management, unless the complainant has already been provided with a response to his/her complaint within that time period.

5.2 Interims notice

If a complaint cannot be processed without delay, preferably within one month, the complainant will be informed of this in the acknowledgement receipt or in an interim notice with the reasons for the delay by mail, fax or e-mail. In addition, a date will be stated when the examination is expected to be completed. If the process is prolonged, the complainant will be informed on a regular basis.

5.3 Response letter

A response letter will be prepared for all complaints as part of the complaint process, reviewed by two staff members, signed, and then sent to the complainant by mail or e-mail. The response letter is sent as soon as the complaint has been conclusively processed.

6 Complaints officer

If the complaint is not resolved to the complainant's satisfaction, they are free to write to Mrs. Lisa Backes, the responsible member of the Management Board.

7 CSSF out-of-court complaint resolution procedure

Finally, if contacting the responsible member of the Management Board has not resulted in a satisfactory response, we would like to point out that the complainant can turn to the CSSF Customer Complaints Office with their concerns. The CSSF will act as an intermediary in order to seek an amicable out-of-court settlement of the disputes between the complainant and the company.

A prerequisite for the opening of the out-of-court complaint resolution procedure before the CSSF is that the complainant has submitted the complaint – as described above – to us. If the complainant has not received a satisfactory solution from us within one month of sending the complaint, the complainant can submit a request for out-of-court settlement of a complaint directly to the CSSF.

You can contact the CSSF either by mail (CSSF, Département Juridique CC, 283, route d'Arlon, L-2991 Luxembourg), fax (00352-26 25 1 2601) or by e-mail (reclamation@cssf.lu).

Further information can be found on the CSSF's website using the following link:

<https://cssf.lu/en/customer-complaints>

Any further legal recourse to the civil courts remains unaffected.