

# COMPLAINT MANAGEMENT PROCEDURE

MAINFIRST AFFILIATED  
FUND MANAGERS S.A.

10.2023

Version 9.0

## Complaint management procedure

The complaint management procedure lays down the principles and procedures for recording, processing and resolving customer complaints. The adequacy and efficiency of the principles mentioned here as well as the compliance with legal and regulatory stipulations is regularly reviewed by the company and necessary adjustments are made and published in written updates to this procedural description.

The complaint management procedure in its current version takes into account the Law of 17 February 2016 ("ADR Law"), CSSF Regulation 16-07 of 26 October 2017 and CSSF Circular 17/671 of 13 October 2017 and informs complainants of the national rules on the out-of-court resolution of complaints. The object of the ADR Law is, inter alia, the transposition into Luxembourg law of Directive 2013/11/EU of the European Parliament and of the Council of 21 May 2013 on alternative dispute resolution for consumer disputes and amending Regulation (EC) No. 2006/2004 and Directive 2009/22/EC ("Directive 2013/11/EU"). Furthermore, by means of Circular 18/698 dated 23 August 2018, the CSSF has established a set of rules regarding, inter alia, the handling of complaints and the reporting obligations to the CSSF in this context. Reference is made to the information form contained in CSSF Circular 17/671.

Reviewing and resolving the customer enquiry is at the forefront of the complaint procedure.

*Please address your complaint in German or English to:*

MainFirst Affiliated Fund Managers S.A.  
16, Rue Gabriel Lippmann  
L-5365 Munsbach

Contact person: Frank Hauprich (responsible member of the Executive Board)  
Tel.: 00352 276 921 1023  
Fax: 00352 276 912 99  
E-mail: [f.hauprich@mainfirst.com](mailto:f.hauprich@mainfirst.com)

Naturally, the complaint is dealt with free of charge. We assure prompt processing of your complaint.

Complaints are handled with the necessary diligence, transparency and objectivity. The processing of a complaint is motivated by objectivity and ascertaining the truth. Customers may address questions, comments and complaints to the Management Company in writing, by telephone or electronically. All complaints received are collected centrally and processed at MainFirst Affiliated Fund Managers S.A..

If possible, complaints are resolved within five bank working days and the complainant is informed of the outcome. The Management Company will respond to the customer regarding the enquiry or complaint, unless otherwise agreed in the individual case. If complexity or other reasons prevent the complaint from being resolved quickly within five bank working days, the customer will receive an interim report on the processing status.

The principles of the complaint management process are published on the Management Company's website ([www.mainfirst.com](http://www.mainfirst.com)).

A central complaints file is kept at MainFirst Affiliated Fund Managers S.A.. All complaints are promptly recorded in the complaints file by the responsible person, indicating the processing status. This complaint file is forwarded to the Management of MainFirst Affiliated Fund Managers S.A. once a month. The documents relating to the individual complaints (correspondence, emails etc.), including information on the handling and resolution, are documented and archived centrally at MainFirst Affiliated Fund Managers S.A. and shows all of the complaints received and further information (reason, complainant, etc.) and shows all of the complaints received and further information (reason, complainant, etc.).

In compliance with the procedural rules, the complainant is entitled to refer the matter to the CSSF by filing the complaint by way of *out-of-court appeal*. The procedure is free of charge. In order to initiate the procedure for the out-of-court settlement of complaints with the CSSF, the Executive Board of MainFirst Affiliated Fund Managers S.A. must first process the complaint. For this purpose, the complaint must be submitted in advance in writing to the management member responsible for complaints at MainFirst Affiliated Fund Managers S.A. If no satisfactory reply or acknowledgement of receipt has been received within one month of the complaint being sent to the management of the financial services provider, a request for out-of-court settlement of the complaint may be submitted to the CSSF. In this case, the complaint must have been lodged with the management of MainFirst Affiliated Fund Managers S.A. within the last 12 months.

The necessary conditions are set out in CSSF Regulation 16-07 and CSSF Circular 17/671 and can be viewed on the website [www.cssf.lu](http://www.cssf.lu).

The Management Company shall, if necessary, if requested to do so and in the interest of a swift out-of-court settlement, provide a copy of CSSF Regulation 16-07 and CSSF Circular 17/671.