

AManco S.A.

Complaints handling Policy

History

Version	Release Date	Description of change	Amended by	Reviewed by	MC approval date	BoD approval date
V1	08/01/2021	Initial policy	ARC		20/01/2021	08/01/2021

Appendices

Reference	Description	Amended by	Reviewed by	MC approval date	BoD approval date
Annex I	Register of Complaints	ARC		20/01/2021	08/01/2021

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1 Glossary

Term	Description
AManco / the Company	AManco S.A.
Board	Board of directors of the Company
Complaint	Any written complaint filed with or addressed to the Company to recognize a right or to redress a harm in the form and procedure as further determined under item 5.1 below. Simple information or explanation requests are not to be regarded as complaints.
Complainant	Any natural or legal person, such as a customer of the Company, an investor, former investor, or actively solicited potential investor, of the Fund(s) having filed a complaint
Complaints Handling Officer	The person responsible at the level of the Senior Management of the Company or, if applicable, the person to which the management of the complaints has been delegated internally
CSSF	<i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg supervisory authority
Investors	The investors of the Funds
Policy	The present complaints handling policy
Senior Management	The persons responsible for the management of the Company, authorised by the CSSF, also known as “authorised management” or “conducting officers”

2 Applicable regulations

Term	Description
AIFM Law	Law of 12 July 2013 on alternative investment fund managers
AIFM Regulation	Commission Delegated Regulation (EU) no 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision
Circular	CSSF Circular 18/698 regarding the authorisation and organisation of investment fund managers governed by Luxembourg law

3 Scope and purpose

The Policy aims at implementing an appropriate internal structure and defining the internal responsibilities and instructions for the reception and the handling of Complaints, to ensure that they are handled in a manner which is fair, objective, transparent, and truth oriented. The Policy also aims at enabling the identification and mitigation of any possible conflicts of interests.

Information regarding the Policy is made available to Investors free of charge.

4 Complaints handling officer

Gaëlle Schneider as a member of the Senior Management of the Company will be responsible for the implementation of the Policy in compliance with the applicable regulations. S/he is also the point of contact for the CSSF to which his/her name is communicated.

Gaëlle Schneider has delegated the day-to-day management of the provisions of this Policy to the Complaints Handling Officer. The Senior Manager responsible will nevertheless will keep the knowledge and control over the internal Complains handling

5 Complaints handling

5.1 Complaint filing

Complaints are expected to be filed in writing to the attention of the Complaints Handling Officer with the reference at the following address or e-mail:

AManco S.A.
Attention: Complaints Handling Officer
19 rue de Bitbourg,
L-1273 Luxembourg

E-mail address: complaints@amanco.lu

Complainants will be able to file Complaints in French and English.

The following information shall be provided to ensure a prompt handling of the complaint:

- Identity and contact details of the complainant;
- Reason of the complaint and the resulting alleged damage or loss in relation thereof;
- Where necessary, copies of any documentation supporting the complaint.

5.2 Complaint reception

The Complaints Handling Officer is in charge of the management of Complaints. All Complaints, which are not directly addressed to the Complaints Handling Officer, should be forwarded to the Complaints Handling Officer without delay.

5.3 Acknowledgement of receipt

The Complaints Handling Officer must send an acknowledgment of receipt in writing within (10) ten business days of receipt of the Complaint, unless the answer itself is provided to the Complainant within this period.

Such acknowledgment of receipt should contain the name and contact details of the person in charge and an indication on when the answer to the complaint can be expected. This time indication shall be within one (1) month after the receipt of the Complaint.

5.4 Registration and information

All Complaints, as well as each measure taken to handle it are properly registered by the Complaints Handling Officer in the Complaints Register. The Senior Manager responsible for complaints handling will receive a copy of the registration of a Complaint in the Complaints Register. The Complaints Register is maintained in electronic format in a folder only accessible by the Complaints Handling Officer and the Board.

If the Complaints Handling Officer estimates that a Complaint may have a material impact (financial and or reputational), the Complaints Handling Officer shall without delay inform the Board, which will decide to inform the CSSF, if needed. The answer to the material impact of Complaints will be approved by the Board.

The Complaints Handling Officer will share the Complaints Register on a quarterly basis with the Board, with the mention of problems identified, the corrective measures taken and the follow-up on these measures.

5.5 Assessment

The Complaints Handling Officer will seek to gather all relevant data and information that is necessary and investigate each Complaint, as soon as it is received.

5.6 Answer to the Complainant

A clear, concise and exact response must be sent within one (1) month of the receipt of the Complaint. If an answer cannot be provided within this time, the Complaints Handling Officer shall inform the Complainant of the reasons of the delay and indicate the date on which an answer is likely to be achieved.

5.7 Escalation of the Complaint

If the Complainant did not obtain an answer or a satisfactory answer from the Complaints Handling Officer, it shall be given the opportunity to raise the Complaint up to the Senior Manager responsible, without prejudice to section 5.8 below. In this respect, the Complaints Handling Officer shall indicate to the Complainant the means to contact the Senior Manager responsible to escalate its Complaint.

5.8 Existence of the out-of-court complaint resolution at the CSSF

Where the Complaint handling at the level of the Complaints Handling Officer did not result in a satisfactory answer for the Complainant, the Complaints Handling Officer shall:

- Provide the Complainant with a full explanation of its position as regards to the Complaint;
- Inform the Complainant, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure before the CSSF and send a copy of the CSSF Regulation or the reference of the CSSF website;
- Indicate to the Complainant the different means to contact the CSSF to file a request; and
- Inform the Complainant, on paper or by way of another durable medium, that s/he can file a request with the CSSF and that, in this case, his/her request with the CSSF must be filed with the CSSF within one (1) year after the filing of the initial complaint with the Company.

6 Documentation and Recording of Complaints

Complaints shall be documented in a Complaints Register by the Complaints Handling Officer and should include the following information:

- Date of the Complaint;
- Name of the Complainant;
- Type of Complaint;
- Summary of the Complaint;
- Summary of corrective measure(s) (specifying any compensation);
- Remarks concerning the need to follow up and suggestions, if any, on possible procedural improvements.

Once fully handled, a report and all documents relating to the Complaint shall be registered in the Complaints Register, including all written communication with the Complainant such as, email, fax messages, letters, etc. Notes shall also be made in the Complaints Register regarding date

and time of telephone calls with the Complainant regarding the Complaint. All received, handled and closed Complaints shall be electronically archived in a computerised secure form. The length of time that the matter remains filed shall be based on its nature. However, all Complaints shall remain on file for at least five (5) years. The Complaints file and the register shall be kept at the Company premises.

7 Complaints monitoring and reporting to the CSSF

Complaints shall be assessed by the Company on an-going basis to enable the identification of systemic or recurring problems, as well as any potential legal and operational risks, for example:

- By analysing the causes of the individual Complaints in order to identify the root causes common to certain types of Complaints;
- By considering whether these root causes may also affect other processes or products, including those to which the Complaints do not relate directly; and
- By considering what actions the Company may need to take to address these root causes.

Following the Article 16 of the CSSF Regulation and further details provided in the CSSF Circular, the Senior Manager responsible for Complaints handling must file to the CSSF on an annual basis, within (5) months following the closure of the financial year of the Company, covering the previous calendar year, a table including the number of Complaints registered, classified by type of Complaints¹, as well as a summary report of the Complaints and of the measures taken to handle them. The reasons for these Complaints as well as the state of progress of their handling must furthermore be mentioned.

Furthermore, a list of the specialized third-parties autorised to handle the Complaints on behalf of the Company will be provided annually to the CSSF, within 5 months following the closure of the financial year of the Company.

¹ An example of table to be annually submitted to the CSSF is available in annex of the CSSF Circular 17/671

8 Cooperation with the CSSF

The CSSF may receive complaints from customers of the Company or Investors for intervening with the aim of settling these complaints amicably. The CSSF does, however, not act as an ombudsman in respect of Complaints which are sent directly to them. They will forward the complaint to the Company.

Should a complaint be forwarded to the Company by the CSSF, the Complaints Handling Officer will immediately send an acknowledgement letter confirming receipt of the complaint. The complaint will then be dealt with in accordance with the process detailed in this Policy.

In case a complaint has been filed with the CSSF and the supervisory authority has requested the Company to take position on the facts or opinions presented by the complainant or to provide information or documents, the Company undertakes to make its best effort to communicate to the CSSF the requested information or documents within the requisite time-period.

Where the CSSF concludes that the complaint is totally or partially justified and asks the Company and the complainant to settle their dispute, the Company will undertake to find with the complainant a common ground to put an end to the complaint.

9 Review of the Policy

The Policy will be reviewed at least once a year in order to assess if it:

- is operating as intended; and,
- is compliant with regulations and standards applicable to the Company.

Where no update is required, the Policy will be applied consistently over time. Where an update is required, the formal approval by the Board and Senior Management, will be asked, and all Staff will be informed.

Annex I – Register of Complaints

N°	Investor's name	Date	Complaint received by	Description	Claim amount	Communication date	Board decision	Date of Board decision	Status