

COMPLAINTS POLICY LEAFLET FOR OCORIAN (LUXEMBOURG) S.A. (THE “COMPANY”)

Ocorian (Luxembourg) S.A. is authorised and regulated by the Commission de Surveillance du Secteur Financier (the “CSSF”) in Luxembourg. We are required to have in place clear and effective procedures for the reasonable and prompt handling of complaints. Each of our clients are important to us, and we believe you have the right to a fair, swift and courteous service at all times. This document sets out the complaints handling procedures that we will follow in accordance with Luxembourg legal and regulatory requirements, should you have a complaint or formally wish to express criticism.

• HOW TO COMPLAIN

In the event a natural or legal person wishes to file a complaint with the Company to recognize a right or to redress a harm, the complainant should address a written request that contains a clear chronological description of the issue and the details at the origin of the complaint, either by email or by post, to the following department:

Compliance Luxembourg
compliancelux_psf@ocoriancloud.onmicrosoft.com
17 Bd FW Raiffeisen, L-2447 Luxembourg
Grand-Duchy of Luxembourg

The complainant may request the Company to provide a complaint form to be filled in accordingly.

Your complaint will be referred to our Compliance Manager. In the event that the Compliance Manager is not well positioned to deal with the subject matter of the complaint, your complaint will be referred to another Manager within the Company.

Should the complainant not receive an answer or a satisfactory answer at this level, the Company offers the possibility for the complainant to escalate the complaint up to the level of the management of the Company at which time we will provide you the contact details of the persons responsible at that level.

Please be informed that the Company shall handle complaints in accordance with the provisions of the Luxembourg Law of 2 August 2002 on Data Protection, as amended from time to time.

• PROCESSING TIME FOR COMPLAINTS

The Company will provide a written acknowledgement of receipt within a period which shall not exceed 10 business days after receipt of the complaint unless the answer itself is provided to the complainant within this period. In this acknowledgement we will provide the name and title of the person that is handling your complaint. This individual will have the authority necessary to investigate and settle the complaint. We will also include a copy of this policy.

The Company shall provide an answer without undue delay and in any case, within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the complainant was sent. Where an answer cannot be provided within this period, the Company shall inform the complainant of the causes of the delay and indicate a date at which its examination is likely to be achieved.

- **INVESTIGATION AND RESOLVING**

We will investigate your complaint fairly, consistently and promptly, determine whether the complaint should be upheld, and (if appropriate) determine remedial action and/or redress. We will set out our conclusions in a final response to you.

If the complaint handling does result in a satisfactory answer for the complainant, the Company will provide you with a full explanation of your position as regards the complaint. We will also remind you by email or in writing (i.e. by letter) of the existence of the out-of-court complaint resolution procedure at the CSSF as well as the procedure on how to file a complaint with the CSSF.

- **RECOURSE TO LUXEMBOURG REGULATOR**

Where the complainant is dissatisfied with the answer received from the Company, he/she can file a request with the Luxembourg regulator, the CSSF. Such a request should be submitted to the CSSF within one year of the complaint having been submitted to the Company (on the same subject).

The request for an out-of-court complaint resolution must be filed with the CSSF in writing, by post, fax or email (to the address/number available on the CSSF website), or online via the CSSF website. In order to facilitate the filing of a request, the CSSF publishes a form on its website. This request can be filed in Luxembourgish, German, English or French. The detailed procedure can be found under the following link:

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

Out-of-court complaint resolution before the CSSF is free of charge. Moreover, no charges will be reimbursed to the parties. The parties keep, at any time, the right to refer the subject matter of the complaint to the competent courts.

- **FURTHER INFORMATION**

Should you wish to receive further information regarding the complaints policy of the Company, please do not hesitate to contact us using the details provided in the 'How to Complain' section.