



Complaints Handling Procedure

iM Global Partner Asset Management

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1. Object

iM Global Partner Asset Management (the “Company”) has adopted a Complaint Handling Procedure, which provides a common, clear and precise understanding of the way in which the Management Company handles claims/complaints.

The Company is subject to the prudential supervision of the Luxembourg financial services regulator, the Commission de Surveillance du Secteur Financier (the “CSSF”).

The purpose of this document is to provide clear, precise and up-to-date information on the Company’s implemented procedures for managing client’s complaints which comply with section 5.5.5. of the 18/698 CSSF Circular and the CSSF Regulation N° 16-07 relating to out-of-court complaint resolution.

This document is made available to the Company’s employees and a summary thereof is published on the Company’s website.

2. Form and conditions of a claim/complaint

A claim and/or a complaint is any expression of dissatisfaction in relation to the provision of a service or failure to provide a service to the Company in order to recognize a right or redress a prejudice apart from usual business dealings such as contract negotiations.

Claims/complaints can be of a written or, subject to a diligent written confirmation from the complainant, a verbal form, and is submitted free of charge, in one of the official languages recognised in the Grand-Duchy of Luxembourg or in the country of residence of the complainant.

The claim/complaint shall be supported by a statement of the complainant of the reasons on which it is based together with, inter alia, the following information/documents:

- a document showing the proper authority of the person formulating the claim/complaint, in case such person is distinct from the complainant and is acting on its behalf,
- a detailed and chronological statement of the facts underlying the claim/complaint, including any relevant document(s) and/or correspondence (if any);
- any other detail(s) of relevance regarding the complaint.
- a copy of a valid identification document of the complainant (natural person) or, where the complainant is a legal person, of the natural person representing this legal person.

The complainant may be requested by the Company to provide further necessary information. In order to respond to the claim, the Company will make all necessary investigations and collect all relevant evidence and information on each complaint.

A claim/complaint can be addressed to the Company’s usual contact of the complainant or to the Company’s Compliance Officer at the following address:

iM Global Partner Asset Management
Compliance Officer: Mr. Lionel FANTAUZZO
10/12 Boulevard Franklin Delano Roosevelt,
L-2150 Luxembourg
Email : eucompliance@imgp.com

Claim/complaints may also be sent to the Company through its delegates or the Funds’ providers such as notably the distributors, the paying agents or the registrar and transfer agent.

3. Company's handling of the claims and complaints

3.1. Upon receipt of a claim/complaint and acknowledgement

Upon receipt of a claim/complaint, the Compliance Officer as well as the Senior Management shall be immediately informed of the claim/complaint.

The Compliance Officer will in due course include the claim/complaint in the appropriate register.

The service or department of the Company which received the claim/complaint must, within 10 business days from the receipt of the claim/complaint, acknowledge such receipt to the complainant, unless the answer itself is provided to the complainant within this period.

The Company will inform the complainant of the follow-up of their complaint.

3.2. Investigation of the claim/complaint

A treatment without delay by the relevant service or department shall be initiated under the supervision and direction of the Compliance Officer, in order for the Compliance Officer to:

1. identify and mitigate any possible conflicts of interests,
2. satisfy itself that the claim/complaint is handled with objectivity and in a way to ascertain the truth,
3. ensure the claim/complaint is properly handled on time and in compliance with the applicable laws and regulations.

The draft response shall be submitted to the relevant Senior Manager for validation and then sent to the complainant within 20 business days of receipt of the claim by the Company, in the language in which the claim was made (provided that it is an official language of a State in which the relevant Fund has been marketed). Such response should outline the results arising from the investigation as well as detail the final decision on the matter. It must indicate:

- i. whether the claim/complaint has been accepted or not;
- ii. where relevant - as to whether any redress or remedial action is being offered;
- iii. in case the final decision is that the claim/complaint has not been accepted - the reasons for that conclusion;
- iv. the name and contact details of the person to whom the claim/complaint can be escalated (the Chairman of the Company's Board of directors);
- v. options of the complainant, including reference of the claim/complaint to an alternative dispute resolution entity or to take civil actions.

In case a response cannot be provided within the period of 20 business days, the Company will inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

In case the complainant doesn't receive a response within 20 business days, the complainant is invited to contact the Company's Compliance Officer.

A regular report including the list of claims being processed and past claims made to the Company as well as the tracking of responses and deadlines is made to Senior Management and the Board of Directors.

3.3. Analysis of data relating to the handling of claims/complaints

The Company shall regularly analyse the data relating to the handling of claims/complaints in order to identify and treat any recurring or systemic problem, as well as any potential legal and/or operational risk.

This can be done by, *inter alia*, :

- analysing the causes of the individual complaints in order to identify the origin common to certain types of complaints;
- considering whether these origins may also affect other processes or products including those to which the complaints do not relate directly; and
- correcting these origins, if it is reasonable to do so.

4. Recourse to an alternative dispute resolution entity

If, after that receiving a response, the complainant considers he/she did not receive a complete, clear and justified response, the complainant has the possibility of recourse by opening a procedure to resolve the claim out of court with the CSSF.

For that the complainant shall file its request with the CSSF within one (1) year after he/she filled its claim/complaint with the Company.

The complainant is invited to:

- use the electronic form available on the CSSF website <https://reclamations.apps.cssf.lu/>
- send an email to the following CSSF address: reclamation@cssf.lu
- send the claim/complaint by mail at the following address:
Commission de Surveillance du Secteur Financier
Département Juridique CC
283, route d'Arlon L-2991 Luxembourg