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## Kroll (Luxembourg) Management Company, S.a.r.l (KLMC)

### Complaints Handling Policy

#### 1. Introduction

Kroll (Luxembourg) Management Company S.a.r.l (Luxembourg) (further as “Kroll”) is a management company (further as “ManCo”) pursuant to Chapter 15 of the Law dated 17 December 2010 relating to undertakings for collective investments and is also an alternative investment fund manager (further as “AIFM”) pursuant to Chapter 2 of the Law dated 12 July 2013 relating to AIFMs.

Kroll has adopted this complaints handling policy (further as “the Policy”) in the context of managing undertakings for collective investment in transferable securities (further as “UCITS”) and alternative investment funds (further as “AIFs”), based in Luxembourg, together referred to as collective investment schemes (further as “CIS”) in accordance with the below:

- CSSF Regulation 16-07 from the 26th October 2016 related to the out-of-court resolution of complaints;
- CSSF Regulation 10-04 from the 24<sup>th</sup> December 2010;
- CSSF Circular 18/698;
- CSSF Circular 17/671 as amended; and
- The Law of 17 December 2010 related to undertakings for collective investment.

#### 2. Purpose of the Policy

The purpose of this Policy is to make sure that the process of handling clients’ complaints is efficient, transparent and dealt with properly and in a timely manner.

#### 3. Definition

For the purpose of this Policy, the ManCo applies a definition of “a complaint” as per the CSSF Circular 17/671: “an investor claim filed with a professional to recognize a right or to redress a harm”. Complaints coming from other parties engaged in a business relationship with Kroll will not be considered under the terms of this Policy.

#### 4. Procedure

Kroll is committed to treating its clients fairly, and to resolve each complaint received in an efficient and transparent manner. Complaints can be either submitted by letter or by an email to the following address:

Kroll (Luxembourg) Management Company Sarl

To the attention of Complaints Handling Officer/ Compliance Officer

Air Building 1, Rue Jean Piret, Luxembourg L-2350

Email : [complaints@kroll.com](mailto:complaints@kroll.com)

Once a complaint is received it will be handled promptly – the Complaints Handling Officer/Compliance Officer of the ManCo will confirm receipt of the complaint within 10 days of its arrival.

The next steps are to be followed internally:

- If a person or an entity within the ManCo receives a complaint, it is to be forwarded to the Complaints Handling Officer/Compliance Officer of the ManCo;
- The complaint is to be reviewed by the party engaged/Conducting Officers of the ManCo;
- Together with the Complaints Handling Officer/Compliance Officer of the ManCo;
- Depending on the nature and complexity of the complaint, there may be a need for the Board of Directors of the ManCo to be included in the review process;
- Each complaint and the solution proposed is recorded in the Complaint Register maintained by the ManCo;
- The Complaint Register is to be included in the Board reports for the Board of Directors' meetings; and
- The Complaint Register is to be reviewed by the Board of Directors during the Board of Directors' meetings and if necessary, some corrective measures may be applied.

## **5. Notification to the CSSF**

The CSSF shall receive on an annual basis:

- A list of persons in charge of dealing with complaints received throughout the period;
- A complete list of all complaints received throughout the period. The Register will be submitted in the form of a template, as indicated in the CSSF Regulation 16-07, Art. 16.

Should the above described process of handling complaints not be satisfactory, the applicant can also contact the local regulator – here the CSSF.

Below the link to the CSSF website:

<http://www.cssf.lu/en/consumer/complaints>

Requests for information or explanations are not considered as a complaint, hence the Policy will not apply.

**Review frequency: Annual/ Compliance Officer & Board of Directors of the ManCo**