

Pancura's ("PANCURA") priority is to provide the highest quality of services to its clients and the funds managed by PANCURA. If, however, they are not satisfied or should encounter a problem PANCURA's complaints handling policy and procedures will ensure that complaints are handled in a fair, objective and truth oriented manner.

A "complaint" is defined, for the purpose of this document, as a written expression of dissatisfaction towards PANCURA to recognize a right or to redress a harm. A complaint is not necessarily founded on valid arguments, but should be formulated in a manner which sets out the basic facts and legal reasons that the filing party believes are sufficient to support a claim against PANCURA. The party making the complaint ("**Complainant**") may be a direct client of PANCURA or a related party.

The Complainant shall kindly use the form on the next page as a guide to include all necessary details and send its written complaint(s) to

**PANCURA**

To the attention of the Chief Compliance Officer  
121, avenue de la Faiencerie  
L-1511 Luxembourg  
Luxembourg  
Email: [compliance@pancura.lu](mailto:compliance@pancura.lu)

Complaint Handling Process

The Chief Compliance Officer of PANCURA is in charge of the collection and management of the complaints handling. Therefore all written complaints, which are not directly addressed to the Chief Compliance Officer, but generally addressed to PANCURA or through an intermediary or a delegated party (in connection to services provided on behalf of PANCURA), should immediately be transmitted to the Chief Compliance Officer who will instruct the complaint.

The Chief Compliance Officer shall send an acknowledgment of receipt without undue delay and within ten (10) days after the receipt of the complaint to the Complainant.

The Chief Compliance Officer arranges to investigate without undue delay the complaint and shall collect from the employees, intermediaries, service providers or delegated parties all data and information that are necessary for the examination of the complaint. Should extensive investigations be necessary, the Complainant will receive a response within one (1) month after the initial filing of the complaint. If the complaint cannot be resolved within one (1) month, the Complainant will be informed by the Chief Compliance Officer of a) the reasons why the issue remains unresolved, b) the next steps to be taken to resolve the matter and c) an indication of the date at which the examination of the complaint will be achieved.

If the Complainant is not satisfied with the quality of the response, the Complainant can escalate its request to Mr Frederik Leser ([frederik.leser@pancura.lu](mailto:frederik.leser@pancura.lu)) who has been appointed by the Board of Directors as the "**Director in Charge of Complaint Handling**".

If, after having contacted the Director in Charge of Complaint Handling, the Complainant does not receive a response – or satisfactory response – within a period of one (1) month, the Complainant can address his/her complaint to the CSSF that foresees an out-of-court complaint resolution procedure in accordance with CSSF Regulation No 16-07. The respective form to fill out and other useful information (e.g. time limits) can be found on the CSSF website at [www.cssf.lu/en/consumer/complaints/](http://www.cssf.lu/en/consumer/complaints/).

**Complaint Submission Form**

1) Date of Complaint Filing:	
2) Name of Fund concerned:	
3) Your contact details:	
Company Name:	
First Name:	
Last Name:	
Address:	
Phone Number:	
Email address:	
4) Date of incident:	
5) Name of the individual and the company the complaint is against, if applicable:	
6) Description of the complaint:	