

## Complaints' Handling Policy

Eric Sturdza Management Company S.A. ("ESMC"), acting as an UCITS Management Company, has, as required by the Luxembourg regulatory framework in force, a complaints' handling policy that is defined, endorsed and implemented through a detailed procedure by the management.

ESMC is aware of its responsibilities and therefore it has aligned its complaints handling policy in accordance with:

- the Law of 17 December 2010 relating to undertakings for collective investment,
- the CSSF Regulation N° 10-04 related to the organizational requirements, conflict of interests, conduct of business, risk management and content of the agreement between a depositary and a Management Company, published on the 24<sup>th</sup> of December 2010,
- the CSSF Regulation N° 16-07 dated 11 November 2016 relating to out-of-court resolution of complaints (the "CSSF Regulation"),
- the CSSF Circular 17/671 entered into force on 13 October 2017 clarifying the procedure to be followed and the information to be provided by the person in charge of a financial institution's customer complaints, if a complaint cannot be treated favorably,
- the CSSF Circular 18/698 entered into force on 23 August 2018 and its Section 5.5.5.: Claim and complaint handling.

Complainants can request information, complain and/or make comments. This right is free of charge. Complainants will upon request be provided with this complaints handling policy containing all the needed information on how to complain and the procedure that will be followed. Eric Sturdza Company S.A. will disclose the complaints' process in the contractual documents.

Any claim may be referred in writing, in English or in French, together with supporting documents by mail to the attention of the Complaints Handling Officer:

Eric Sturdza Management Company S.A.  
To the attention of: Head of Compliance  
16, rue Robert Stumper  
L-2557 Luxembourg  
Grand-Duchy of Luxembourg

or by email to:

[compliance@ericsturdza.lu](mailto:compliance@ericsturdza.lu)

Where, in first instance, the complainant did not obtain an answer or a satisfactory answer, the complaint may be addressed to the management board of ESMC to:

Eric Sturdza Management Company S.A.  
To the attention of: Conducting Officer Compliance  
2, place de Paris  
L-2314 Luxembourg  
Grand-Duchy of Luxembourg

or by email to:

[info@ericsturdza.lu](mailto:info@ericsturdza.lu)

The complaint shall be supported by a statement of the reasons on which it is based together with the following documents:

- A detailed and chronological statement of the facts underlying the complaint and the steps already taken;
- In the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that person is legally entitled to act so;
- A copy of a valid ID document of the applicant (natural person) or, where the applicant is a legal person, of the natural person representing this legal person;

A representative of ESMC will contact the applicant in the following 10 working days and will keep the applicant informed about the progress in handling the claim.

An answer is in any case provided within a period of maximum one month between the date of receipt of the complaints and the date at which the answer was sent. Where an answer cannot be provided within this period, ESMC shall inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

The applicant is informed of its possibility to escalate its claim to the CSSF, following the terms and conditions described in CSSF Regulation 16-07, relating to out-of-court dispute settlement (<http://cssf.lu>).

*Last update of the Complaints handling policy: February 2022*