
Complaints Handling Policy Statement

1. Introduction

The purpose of this Complaints Handling Policy Statement is to provide investors with details on the Generali Fund Solutions S.A. ("GFS") Complaints Handling Policy which is established in accordance with CSSF Circular 18/698, Directive 2009/65/EC, being applicable to all UCITS Funds under its management ("UCITS"), and Directive 2011/61/EU for Alternative Investment Funds ("AIFs") under its management, together referred to as "the Funds". A paper copy of GFS's Complaints Handling Policy is available free of charge upon request.

2. Definition of a Complaint

A complaint is any oral, electronic or written communication from any natural or legal person and addressed to GFS, filed to recognize a right or to redress a harm. For the purpose of this policy, simple information or explanation requests are not to be regarded as complaints. The client communication must clearly state that the request concerns a complaint, so it is handled accordingly and follows the established procedure referred to in this policy.

3. Complaints Handling Officer

Regulation requires that GFS appoints a person responsible at the level of Senior Management for the collection, centralization and treatment of all complaints filed. In accordance with this requirement, GFS has appointed the Conducting Officer in charge of the Complaints Handling function as Complaints Handling Officer.

The Complaints Handling Officer is responsible for the implementation of an efficient internal procedure for Complaints Handling.

The role of the Complaints Handling Officer will be to:

- Ensure consistent escalation of complaints;
- Monitor the incidence of complaints and maintain a complaints log which will capture all complaints;
- Provide regular reporting to the Senior Management of GFS on the nature and frequency of complaints;
- Act as the point of contact with the CSSF.

Such appointment and any change thereof will be duly communicated to the CSSF by GFS

4. Filing a Complaint

A complaint can be filed to the attention of the Complaints Handling Officer via:

- **Email:** complaints_handling@generalifundsolutions.lu
- **Mail:**
 Generali Fund Solutions S.A.
 Attention: Complaints Handling Officer
 4, rue Jean Monnet
 L-2180 Luxembourg
- **Required information:**
 - Identity and contact details of the complainant
 - Reason for the complaint and the alleged damage or loss
 - Where necessary, copies of any documentation supporting the complaint

5. Assessment/resolution of a complaint by GFS

Once a complaint is received, the Complaints Handling Officer takes charge of the process. The Officer is responsible for ensuring that every complaint is handled fairly, objectively, and efficiently. The Officer will send an acknowledgement of receipt to the complainant within ten business days, unless the complaint can be resolved within that period. This acknowledgement will include the name and contact details of the person managing the complaint, as well as an indication of when the complainant can expect a substantive response.

The Officer will then investigate the complaint, gathering all necessary information and, if required, consulting with other departments or external legal advisors. The complaint is recorded in the Complaints Register, which is maintained securely and shared with senior management on a regular basis.

A formal response to the complaint must be provided within one month of its receipt. If it is not possible to resolve the complaint within this timeframe, the complainant will be informed of the reasons for the delay and given an updated estimate of when a resolution can be expected.

If the complainant is dissatisfied with the response from the Complaints Handling Officer, they have the right to escalate the matter to the Board of Directors of GFS. The Officer will provide the necessary contact details for this escalation.

6. Out-of-Court Complaint resolution at the CSSF

Where the complaint handling at the level of the Complaints Handling Officer did not result in a satisfactory answer for the complainant, the Complaints Handling Officer shall, in writing, on paper or by way of another durable medium:

- provide the complainant with a full explanation of his/her position as regards the complaint;
- inform the complainant of the existence of the out-of-court complaint resolution procedure before the CSSF and send a copy of the CSSF Regulation or the reference of the CSSF website;
- indicate to the complainant the different means to contact the CSSF to file a complaint;
- indicate that the request with the CSSF must be filed with the CSSF within one (1) year after the filing of the initial complaint with the Company.

The process for filing a complaint with the CSSF can be found by clicking on the following link: [Customer complaints – CSSF](#)

7. Documentation and recording of complaints

Each complaint received should be recorded promptly by the Complaints Handling Officer in the Complaints Register of GFS.

The Complaints Register shall include the following information:

- Date of the complaint;
- Name of the complainant;
- Type of complaint;
- Summary of the complaint;
- Summary of corrective measure(s) (specifying any compensation);
- Remarks concerning the need to follow up and suggestions, if any, on possible procedural improvements.

Once fully handled, a report and all documents relating to the complaint shall be kept together with the Complaints Register, including all written communication with the complainant such as email, letters, etc. Notes shall also be made in the Complaints Register regarding date and time of telephone calls with the complainant regarding the complaint. All received, handled and closed complaints shall be electronically archived in a computerized secure form. Both the complaints file and the register shall be kept at GFS premises for five (5) years after the complaint was completed.

8. Review and Update of the Complaints Handling Statement

This statement is reviewed at least annually by Generali Fund Solutions to ensure its continued alignment with regulatory requirements and prevailing market standards.

Where no update is required, the statement shall remain applicable and consistently enforced over time.