

## **Complaints Handling**

### **1. INTRODUCTION AND PURPOSE**

At Optimum Asset Management S.A. (“**OAM**”) we highly value the interests of our investors and always aim to deliver the best and most efficient services and outcomes to our investors. We have therefore implemented robust complaints handling processes and procedures to ensure that any concerns or expressions of dissatisfaction (hereafter “**complaint**”) are treated in a fair and transparent manner.

We want to encourage investors to express any complaints in relation to their investment or potential investment into the a fund managed by OAM and regard every complaint as opportunity to strengthen our processes and procedures and thus improve investor outcomes.

Whilst there is neither an exhaustive list of complainants or complaints nor a defined method of the recognition of complaints, it is considered that the opinion of each investor should be listened to and treated with particular care.

### **2. COMPLAINTS HANDLING**

Complaints may be submitted in English, free of charge, by letter, email or fax directly addressed to the registered office of OAM listed hereafter, or indirectly to any delegated service provider of a fund managed by OAM:

Optimum Asset Management S.A.  
4 Boulevard Royal, L-2449 Luxembourg,  
Grand Duchy of Luxembourg  
Attn: Complaints Handling Officer, Mr. Andrea Suriano  
E-mail : [Andrea.Suriano@optimumam.com](mailto:Andrea.Suriano@optimumam.com)  
Telephone : +352 270 484 181

The complaint must include the following:

- full name of complainant, with, as the case may be, information on any shareholding in the Managed AIFs and the sub-funds concerned;
- a copy of a valid ID document of the complainant (natural person) and, where the complainant is a legal person, of the natural person representing this legal person;
- where the complainant is acting on behalf of a legal person, a certified true copy of such document evidencing the complainant’s authority;
- a description of the facts, acts or omissions underlying the complaint.

OAM considers investor complaints as serious matters that require the highest priority and generally sends out a response within one month from the date of receipt of the complaint. However an acknowledgement of the complaint will be sent to the complainant within 10 business that includes as a minimum:

- the name of the complainant and the date of receipt of the complaint;
- the name and contact details of the Complaints Handling Officer (or any other person in charge of the complaint);
- confirmation that the complaint has been received, is under investigation and that the acknowledgement will be followed in due course by more substantive information.

When submitting a complaint, the investor should attempt to provide all available information regarding the respective case. If the information obtained about the complaint is not sufficient to provide a concluding

response, OAM may seek to contact the investor to obtain a further understanding of the circumstances of the complaint.

If it should become apparent that processing will take longer than one month from the date of receipt of the complaint, OAM will advise the complainant in writing and provide an explanation as to why the complaint could not be answered at this stage.

A complaint will only be closed when OAM has communicated a response to the complainant, addressing the issues.

In cases where a complaint cannot be resolved to the full satisfaction of the complainant, OAM will provide a full explanation to the complainant and give the complainant the opportunity to raise the complaint with the person responsible at senior management level.

Please be informed that complainants may decide to take a different view. In such a case they have the possibility to refer the matter to out-of-court resolution mechanism of the Commission de Surveillance du Secteur Financier ("CSSF") within one year after the complaint was filed with OAM as described by CSSF Regulation 16-07. This regulation enables clients of Luxembourg financial institutions to involve the CSSF as a business mediator, at no cost to them. More information can be found on the dedicated CSSF website:

<https://www.cssf.lu/en/Document/request-for-out-of-court-complaint-resolution-with-the-cssf/>

Furthermore OAM may decide to have recourse to the out-of-court complaint resolution procedure of the CSSF to resolve the dispute. In such case it will:

- confirm its decision to the complainant in a formal manner;
- provide a copy of CSSF Regulation 16-07 to the complainant as well as the reference to the dedicated CSSF website mentioned above; and
- inform the complainant, in a formal manner, that and how s/he can file a request with the CSSF and that, in this case, his/her request must be filed with the CSSF within one year after s/he filed his/her complaint with OAM.