

Complaint Policy

BlueOrchard Asset Management (Luxembourg) S.A. ("BOAM") has implemented procedures for managing fund client complaints which complies with the requirements of CSSF Regulation 16-07 relating to the out-of-court resolution of complaints.

A complaint is an expression of dissatisfaction received in writing (letter or email), justified or not, from or on behalf of an eligible complainant, about BOAM's or its delegates' provision of or failure to provide a financial service. A request for information, clarification or service is not a complaint.

In this context, any complaint concerning the funds managed by BOAM or BOAM itself must be sent in English, French or German either in email with the subject: "Complaint" to <u>info@blueorchard.com</u> or with a letter posted to:

BlueOrchard Asset Management (Luxembourg) S.A. Complaints Officer 44, rue de Strasbourg L-2560 Luxembourg

BOAM will treat any complaint as follows:

- An acknowledgement letter will be sent to the complainant within ten business days as of the receipt of the complaint if the complaint cannot be closed before this timeline.
- An update letter will be sent to the complainant one month and every four weeks thereafter to inform the complainant on the status of the investigation related to the complaint.
- A final letter will be sent to the complainant to inform him/her on the outcome of the investigation and the actions taken to resolve the complaint.

BOAM informs its fund clients of the existence of the out-of-court dispute settlement procedure with the Commission de Surveillance du Secteur Financier ("CSSF"), the supervisor of Luxembourg financial sector.

Where a fund client did not receive a response or satisfactory response within one month of a complaint being submitted to BOAM, s/he may file his/her request with the CSSF. The request must be filed with the CSSF in writing, by post, by fax or by e-mail or directly online on the CSSF website (the CSSF publishes a form on its website in order to facilitate the failing of requests).

Commission de Surveillance du Secteur Financier L-2991 Luxembourg direction@cssf.lu www.cssf.lu