

# Complaints Handling Policy

As of September 10, 2024

## 1. Introduction

### 1.1. General

The compliance function (the “**Compliance Officer**”) of Innpact Fund Management S.A. (the “AIFM” or the “Company”) ensures that its operations are in line with the following applicable laws and regulations:

- Alternative Investment Fund Managers Directive 2011/61/EU (“AIFMD”);
- Luxembourg law dated 12 July 2013 on alternative investment fund managers (“AIFM Law”);
- CSSF Circular 18/698 Authorisation and organisation of investment fund managers incorporated under Luxembourg law (the “Circular”);
- CSSF Regulation 16-07 relating to the out-of-court resolution complaints.

### 1.2. Principles of effective complaint handling

- Disclosure: the complaints handling process is available on the AIFM webpage.
- Responsiveness: all complaints shall be treated in a careful and prompt manner. The AIFM endeavours to resolve complaints within one (1) month after receiving the complaint.
- Easiness: The complaint handling is free of charge. Each complainant is informed of the name and the contact details of the person in charge of his/her file and therefore may correspond directly with this person. The AIFM endeavours to communicate in a plain and easily comprehensible language.
- Objectivity: each complaint is addressed in an equitable, objective and unbiased manner. The AIFM seeks to search for the truth and a fair resolution of complaints.
- Confidentiality: The AIFM shall ensure that the processing of personal data complies with applicable rules on personal data protection.

## 2. Complaints Handling Responsible

The Board of the AIFM appointed the Compliance Officer as **Complaints Handling Officer** responsible for the handling, centralisation, treatment and monitoring of all complaints filed by clients and investors of the funds under management. Such appointment, as any further change, was and will be duly communicated to the AIFM’s supervisory authority (CSSF).

### 2.1. Complaint handling

The AIFM’s complaints handling procedure includes the following phases:

- 1) Complaint reception;
- 2) Acknowledgement of receipt;
- 3) Registration and information;
- 4) Investigation;
- 5) Answer to the complainant;
- 6) Existence of the out-of-court complaint resolution at the CSSF.

### 2.2. Complaint reception

In case a complaint arises, it must be addressed to:

#### **Innpact Fund Management SA**

5, Rue Jean Bertels  
L-1230 Luxembourg  
Fax: +352 27029320

### **2.3. Acknowledgement of receipt**

On receipt of a complaint, the Complaints Handling Officer shall send an acknowledgment of receipt within ten (10) days after receipt of the complaint (unless the complete answer itself is provided to the complainant within this period).

The acknowledgment of receipt should inform the complainant of:

- the name and contact detail of the person in charge of his/her file, if different from the Complaints Handling Officer; and
- the timescale to respond to the complaint.

### **2.4. Registration and information**

If the complaint can be resolved to the complainant's satisfaction within 24 hours of first being received, a note should be placed on the complaints register briefly outlining the nature of the complaint and the action/outcome agreed with the latter.

If the complaint cannot be resolved within 24 hours, or has come through CSSF, the Complaints Handling Officer should log the complaint in the complaints register and immediately informs the Conducting Officers and the Board.

### **2.5. Investigation**

Once received, the Complaints Handling Officer arranges to investigate the complaint. A review of the investor file/record (if any) and relevant documentation should be carried out in an attempt to resolve the complaint without delay.

### **2.6. Answer to the complainant**

The Complaints Handling Officer shall provide an answer within a period which cannot exceed 1 month between the date of receipt of the complaint and the date at which the answer to the complainant is sent.

However, some complaints may take a longer period to investigate and resolve. In such cases, there should be a continuous communication with the complainant at reasonable intervals, at least on a monthly basis, while each follow-up communication should indicate the estimated date whereby the issue and its review are likely to be fully resolved.

### **2.7. Existence of the out-of-court complaint resolution process involving CSSF**

If the complaint handling process does not represent a satisfactory answer for the complainant, he/she can contact the CSSF and address his/her complaint as provided under the following link:

<https://www.cssf.lu/en/Document/cssf-regulation-n-16-07>

## **3. Communication and information to the CSSF**

The CSSF is competent to receive complaints by clients of the AIFM or investors in the funds managed by the AIFM and to act as an intermediary with them in order to seek an amicable settlement to these complaints.

The CSSF's opinion is not binding on the client and the AIFM. Its powers are neither those of a judge or arbitrator passing a mandatory judgment nor those of an ombudsman in charge of defending the citizens' rights against public authorities.

The CSSF may end the procedure at any time if it finds that the client or the AIFM uses the procedure for purposes other than the search for an amicable resolution of the complaint.