

COMPLAINTS HANDLING POLICY STATEMENT

Introduction

The purpose of this Complaints Handling Policy Statement is to provide investors with details on the Generali Investments Luxembourg S.A. (“GIL”) 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 GIL’s Complaints Handling Policy is available free of charge upon request.

GIL has adopted a Complaints Handling Policy in accordance with the applicable Luxembourg laws and regulations.

Purpose and Objective of the Complaints Handling Policy.

The purpose of the Complaints Handling Policy is to establish an efficient and transparent framework for the handling client complaints to ensure that complaints are handled fairly and promptly.

Definition

For the purpose of this Policy, a complaint is defined in the CSSF regulation No. 16-07 as “an investor claim filed with a professional to recognise a right or to redress a harm”. Accordingly, dissatisfaction expressed by another service provider of the financial sector with whom GIL has entered into a business relationship shall not qualify as a complaint for the purpose of this Policy. Requests for information or explanations are not considered as a complaint.

Complaints Notification Procedure

Investors may file complaints with GIL free of charge in the official language or one of the official languages of their Member State.

GIL is committed to treat clients fairly. To resolve complaints in an effective and transparent manner, complaints shall be notified in writing to GIL’s Complaints Handling Officer.

Complaints can be submitted by letter to the following address:

Generali Investments Luxembourg S.A.

To the attention of the Complaints Handling Officer

4, rue Jean Monnet

L-2180 Luxembourg

Complaints can also be submitted by email to the address gil_complaint@generali-invest.com

GIL will respond in writing within ten (10) business days after the receipt of the complaint, to either acknowledge the receipt of the complaint or provide the investor with a response if already possible. This letter will also mention the name of the person in charge of handling the complaint.

An answer will be sent without undue delay and in any case, no later than one month after the complaint has been received. Where an answer cannot be provided within this period, GIL shall inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved. If for any reasons the complaints handling process does not result in a satisfactory response, GIL will provide the complainant with a full explanation of his/her position as regards the complaint and will further inform him/her on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure at the CSSF. The complainant can file a request with the CSSF within one year after the complaint was filed with GIL. Additionally, and where the case arises, GIL will itself inform the complainant where it takes the decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute. This procedure is free of charge for the applicant. The CSSF contact details and the CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints as well as the complaint filing form of the CSSF can be found on the following sites:

- **Complaint filing form of the CSSF:**

<https://www.cssf.lu/en/Document/interactive-form-for-complaints/>

- **CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints:**

http://www.cssf.lu/fileadmin/files/Lois_reglements/Legislation/RG_CSSF/RCSSF_No16-07eng.pdf

- **CSSF E-Mail address:**

reclamation@cssf.lu

- **CSSF postal address:**

Commission de Surveillance du Secteur Financier

Département Juridique CC

283, route d'Arlon

L-2991 Luxembourg

Tel : (+352) 26 25 1-2904

- **CSSF FAQ:**

<https://www.cssf.lu/en/customer-complaints/>