



UNION BANCAIRE PRIVÉE

Complaints Handling – Summary Information

Overview

UBP Asset Management (Europe) S.A. (hereinafter “UBP AM”) has put in place and maintains the effectiveness of a complaints handling policy. The purpose of this policy is to ensure that clients’ complaints are processed in a prompt and fair manner, in accordance with the applicable regulations.

Complaints are not considered as a constraint but rather as an opportunity to improve our services and to protect investors’ interests.

As such, UBP AM’s duties to provide adequate response to any client’s complaint are not only part of its code of conduct but it is also a key component of the brand image of UBP. Accordingly, UBP AM makes every effort to assess any complaints in a fair, consistent and prompt manner.

Any information in relation to this procedure is made available to investors free of charge.

How to file a Complaint?

Any type of complaint, whether it be operational or product-related, may be submitted free of charge. In order to file your complaint, please use one of the following means :

- By Email to the following address: -LuxUBPAMcompliance@ubp.com ; or
- By Letter, addressed to *UBP Asset Management (Europe) S.A, 287-289 route d’Arlon, L-1150 Luxembourg*.;or

The reasons for the complaint must be stated and the following documents submitted:

- a detailed chronological summary of the facts leading to the complaint;
- a declaration stating that you have not instituted court proceedings or appointed an arbitrator or another out-of-court complaints body in Luxembourg or elsewhere;
- if someone is acting on your behalf, a document confirming their power to represent you;
- a copy of your current passport or identity card and, where applicable, that of your representative;
- a document proving that you are a shareholder (or former shareholder) and details of the position that you hold or held in one of the funds managed by UBP AM.

In the first instance upon filing a complaint, UBP AM’s Complaints Handling Officer will assess the complaint by looking at the subject matter of this complaint and determine whether it should uphold the complaint in the first place. The Complaints Handling Officer will then conduct adequate investigations to clarify the truth objectively, impartially and in a credible manner.

Following this, your complaint will receive the highest level of attention, with the aim of resolving the issue in as short a timeframe as possible. Throughout the process, UBP AM will ensure that you are kept up to date on any and all progress.

For the simple cases, UBP AM will provide a response to you in writing, normally within ten (10) business days of the grievance being received.

For more complex cases, the Complaints Handling Officer will acknowledge receipt of your complaint within ten (10) business days and will inform you that your claim is being handled and managed in the best possible way.

In any case, UBP AM will provide an appropriate response to your complaint within one month of receipt of your complaint, except in exceptional valid circumstances.

If you have not received any response within one month from the date on which the complaint was sent, or if you consider the response as not satisfactory, you have the right to submit your complaint directly to the management of our company at the above-mentioned addresses; or to the Commission de Surveillance du Secteur Financier (CSSF) in accordance with CSSF Regulation 16-07 of 26 October 2016 on the out-of-court resolution of complaints, published in Mémorial A, No. 228 on 11 November 2016 and available for download from the CSSF website: www.cssf.lu

The request must be filed with the CSSF in writing, by post or by fax to the CSSF or by e-mail, or online on the CSSF website. The complainant may use the dedicated form published on the CSSF's website:

- Via the Internet on CSSF's website: <http://www.cssf.lu/fr/consommateur/reclamations/>

- By Email to the following address: direction@cssf.lu or reclamation@cssf.lu

- By Letter, addressed to

Commission de Surveillance du Secteur Financier;
Département Juridique - Service JUR - CC
283, route d'Arlon
L-1150 Luxembourg

- By facsimile : (+352) 26 25 1 - 2601

All records of material correspondence will be retained in UBP AM's complaint records and logged in accordance with its complaints handling procedure.