

COMPLAINTS HANDLING PROCESS

Luxembourg

2025



NOW AND FOR FUTURE GENERATIONS

Legal and Regulatory Framework

Stonehage Fleming Luxembourg S.A. ("SFLUX") is subject to the prudential supervision of the Commission de Surveillance du Secteur Financier (the "CSSF"). SFLUX is committed to providing high quality services to all its stakeholders. In the event that a problem occurs, SFLUX is committed to ensuring that an expedited review of the complaint is performed, the result of which will be reverted upon promptly.

Definition

A complaint is any expression of dissatisfaction submitted to SFLUX by a client, investor, their authorised representative, or any other stakeholder, relating to the services provided by the Company, with the aim of asserting a right or seeking redress for a perceived harm.

How to submit a complaint

If a stakeholder of SFLUX wishes to raise a complaint, it can be done by post, email, or verbal communication subsequently recorded in writing. All complaints will be handled and recorded in accordance with SFLUX's Complaints Handling Procedure and applicable regulatory obligations.

The complaint can be addressed to:

- The Client Relationship Manager directly;
- The Head of Client Relationship Management; or
- The Complaints Officer.

Mail: STONEHAGE FLEMING LUXEMBOURG S.A., 58 rue Charles Martel, L-2134 Luxembourg
Email: complaints@stonehagefleming.com

To ensure that the complaint is handled in the most efficient and appropriate way, the following information must be provided to SFLUX:

- Your full name
- The client involved
- Your role in relation to the client (e.g. directors, representative of the client etc)
- Your contact details (address, email, phone number)
- The fund or sub-fund concerned (if applicable)
- A detailed description of the facts underlying your complaint
- Any supporting documents or correspondence relevant to your complaint
- Any other information that you consider useful for us to understand your case

Complaints handling

Upon receipt of any complaint, the dedicated person from the first line assigned to the case will issue an acknowledgement towards the complainant, within 10 business days of complaint receipt date, stating the name of the appointed individual who will be handling the complaint.

If another Authorised Firm or a Regulated Financial Institution is entirely or partly responsible for the subject matter of a complaint then the complaint, or relevant part of it, may be referred to the other Authorised Firm or Regulated Financial Institution.

In such cases the following action will be taken:



- Inform the complainant promptly and in writing that the complaint will be referred, either entirely or in part, to another Authorised Firm or Regulated Financial Institution, and obtain the written consent of the complainant to do so.
- If the complainant consents to the referral of the complaint, the complaint will be referred to the other Authorised Firm or Regulated Financial Institution promptly and in writing.
- Inform the complainant promptly and in writing that the complaint has been referred and include adequate contact details of any individual at the other Authorised Firm or Regulated Financial Institution responsible for handling the complaint.
- Continue to deal with any part of the complaint not referred to the other Authorised Firm or Regulated Financial Institution, in accordance with the normal procedures.

The person responsible for handling the complaint will then provide a written response within one month of receipt of the complaint. However, if the complaint is sufficiently complicated to warrant longer investigation or it requires a review of further information and a response cannot be given within one month, SFLUX will inform the Complainant of the reason for the delay and indicate the date by when it will be possible to handle the complaint.

Where the complainant has not obtained a satisfactory resolution and does not accept the first line's response, the complainant may contact the Complaints Officer, who will then handle the complaint with the support of any other function deemed appropriate to remediate the situation promptly. The Complaints Officer may contact the complainant directly, as well as request further clarification from the first line, in addition to ensuring that a fresh and independent assessment is carried out.

If deemed necessary, the Complaints Officer may escalate the complaint to the Management Committee of SFLUX or the Board of Directors of the fund if the complainant is an investor.

Contact details of the Complaints Officer:

via email or letter:

Email: complaints@stonehagefleming.com

Mail: Complaints Officer,

Stonehage Fleming Luxembourg S.A., 58 rue Charles Martel L-2134 Luxembourg.

The Complaints Officer then issues the final written position of the Company which consists in SFLUX's definitive answer.

This Complaints Guidelines does not affect any right of legal action you may have against the parties concerned.

Out-of-court complaint resolution procedure at the CSSF

The CSSF is competent to receive complaints from customers (natural or legal persons) of the professional's subject to its supervision and to act as an intermediary in order to seek an amicable settlement of the complaints.

The CSSF acts in its capacity as alternative dispute resolution ("ADR") entity, notably pursuant to the European legislation relating to the out-of-court resolution of consumer disputes that was transposed into Luxembourg law and introduced into the Consumer Code in 2016. The CSSF is registered on the list of ADR entities within the meaning of Article L. 431-1 of the Consumer Code and on the list of ADR entities established and published by the European Commission.

In accordance with CSSF Regulation 16-07, the complainant may initiate an out-of-court complaint



resolution procedure with the CSSF only if all of the following conditions are met:

- The complaint concerns a professional entity supervised by the CSSF;
- The issue relates to a financial product, financial service, or statutory audit;
- The complaint does not pertain to the internal business practices or procedures of the professional;
- The complaint was first submitted in writing to the person responsible for complaint handling at the management level of the concerned professional;
- The complainant has not received a satisfactory response or an acknowledgment of receipt within one month from the date the complaint was sent;
- The matter has not already been, and is not currently being, reviewed by another alternative dispute resolution body, arbitrator, arbitration tribunal, or court, whether in Luxembourg or abroad;
- The complaint is not manifestly unfounded, frivolous, or abusive;
- The complaint is submitted to the CSSF within one year of the initial complaint being filed with the professional;
- The complaint handling does not seriously impair the efficient functioning of the CSSF.

Complaints to the CSSF must be submitted in writing and can be sent by post, fax, or email. Alternatively, clients may use the online complaint form available on the CSSF website at www.cssf.lu/consumer/complaints. To facilitate the process, the CSSF provides a standardized complaint form, which should be used when submitting a complaint.

Complaints are handled by the CSSF's Legal Department – Consumer Protection/Financial Crime. They can be submitted in one of the following ways:

Online: By completing the complaint form directly on the CSSF website (www.cssf.lu/consumer/complaints) and attaching all relevant documents. The CSSF provides a standardized complaint form which should be used in order to facilitate the process;

By email: Send the completed PDF form to reclamation@cssf.lu;

By post (no registered mail required):

Commission de Surveillance du Secteur Financier
Département Juridique CC
283, route d'Arlon
L-2991 Luxembourg

The complaint shall be filed together with all relevant documents in English, French, German or Luxembourgish. The extrajudicial resolution procedure will, in principle, be conducted in one of the above-mentioned languages in which the complaint was filed with the CSSF.

The complaint shall be duly motivated and accompanied by the following documents:

- A detailed and chronological description of the facts of the complaint and of the steps already followed by the complainant;
- A copy of the complaint that was sent to the person responsible for complaint handling;



- A copy of the answer that was given by the professional to the complaint that was sent to the person responsible for complaint handling or the confirmation by the complainant that she/he did not receive an answer within one month after she/he sent her/his complaint to the manager responsible for complaint handling;
- A confirmation of the complainant that she/he has not referred the matter to a court, an arbitrator or another out-of-court complaint resolution body in Luxembourg or abroad (see confirmations to be given in the complaint form);
- An agreement to the terms according to which the CSSF intervenes as ADR (see confirmations to be given in the complaint form);
- An express declaration granting the CSSF the right to transmit the complaint (including the attachments) as well as any future correspondence or information to the professional aimed at by the complaint (see confirmations to be given in the complaint form);
- In any case (should another person act on behalf or not of the complainant), a copy of a valid ID document of the complainant (natural person) or, where the complainant is a legal person, a valid ID document of the natural person representing this legal person;
- A copy of the power of representation if the complainant is represented by a third party;
- In case the complainant is acting on behalf of a legal entity, an official document stating that the complainant is legally entitled to represent the company concerned (for example an extract of the trade and company register) must be attached to the complaint.

Any document that is potentially useful for a proper understanding of the dispute with the professional will be attached to the complaint.

If the file is sent by post, original documents must be kept and only copies of the documents should be enclosed with the mail.

This document is published on Stonehage Fleming website:

<https://www.stonehagefleming.com/legal> under the 'Legal & Regulatory Information' section, specifically within the area dedicated to Luxembourg.

Appendix 1 – Commission de surveillance du secteur financier - Customer complaint form

[Formulaire Réclamation EN](#)

Appendix 2 – Commission de Surveillance du Secteur Financier – circular 16-07 relating to out-of-court complaint resolution

[RCSSF No16-07eng.pdf](#)

Appendix 3 – Commission de Surveillance du Secteur Financier - circular 17-671 Specifications regarding CSSF Regulation N° 16-07

[cssf17_671eng.pdf](#)

