



**Policy:**  
**Complaints Handling Policy**



## COMPLAINTS HANDLING POLICY

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## 1 PURPOSE

In accordance with:

- Law of 17 December 2010 concerning UCITS;
- CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints;
- CSSF Circular 14/589;
- CSSF Circular 12/546;
- Regulation CSSF 10-04.
- CSSF Circular 17/671

The Company is required to implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from Investors.

The purpose of this document is:

- To provide clear and precise information on SAMCO Complaints Handling Policy;
- To ensure that complaints are handled properly and resolved promptly;
- To inform investors on the process for filing a complaint by making this document available on the website

## 2 DEFINITION

SAMCO defines a complaint as “An expression of at least one of the three following elements”:

- The dissatisfaction with the general level of service provided by the participants of the fund (central administration: administrative agent, transfer agent, custodian, management company, domiciliary agent, investment manager/adviser, distributor, initiator etc...),
- The identification of an actual or potential harm;
- The claim of a remedy or compensation.

## 3 HOW TO RAISE A COMPLAINT TO SAMCO

A complaint can be addressed to SAMCO in writing by post or by email to the following addresses:

- **By email:**  
[Compliance@samarang.lu](mailto:Compliance@samarang.lu)
- **By post:**  
Samarang Asset Management S.A.  
Attn. Compliance Officer  
11a, Avenue Monterey  
L-2163 Luxembourg



The complainant can file, free of charge, his/her complaint in any of the official Languages of Luxembourg as well as in English.

A complaint should, as a minimum, include the following:

- A clear identification of the person/party filing the Complaint (please provide the name under which the complainant is listed under the shareholders register or the name of the intermediary acting on behalf of the complainant);
- A detailed explanation of the facts (issue or transaction) at the origin of the Complaint;
- A copy of all related/necessary supporting documents;
- Communication preference (post, email) and respective contact details.

#### 4 PERSON RESPONSIBLE FOR COMPLAINTS HANDLING

SAMCO has designated its Compliance Officer as responsible for the handling of complaints in conjunction with the member of the SAMCO Authorized Management (the Conducting Officer) who has been assigned responsibility for responding to complaints ("the Relevant Manager").

Relevant Manager contact details:

Mr Phu-Van Luc

Tel. +352 28 80 28 08 22

[PhuVan.luc@samarang.lu](mailto:PhuVan.luc@samarang.lu)

#### 5 TIMING OF THE PROCEDURE

An acknowledgement of receipt should be sent to the Complainant within the 10 business days following the receipt of the Complaint and specifying the estimated timeframe by which the Complainant should expect to receive a detailed and complete response unless the answer itself is provided to the Complainant within this period.

The name and contact details of the person handling the complaint are provided to the Complainant.

SAMCO shall provide the complainant with an answer within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the complainant is sent.

SAMCO will use all means at its disposal to reply to the more straightforward complaints within a matter of days. If the time necessary to prepare the reply is excessive, the Person responsible for complaints handling will inform the Complainant of the reasons for the delay and indicate the date upon which its examination is likely to be completed.



## 6 CSSF OUT OF COURT RESOLUTION OF COMPLAINTS

Where the handling of the Complaint by the Compliance Officer in conjunction with the Relevant Manager does not result in a satisfactory outcome for the Complainant, the Company shall provide him with a full explanation of the position as regards the Complaint.

The professional shall inform the complainant, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure at the CSSF.

If the case arises, the professional confirms his/her decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute.

Where the professional has undertaken to resort to the out-of-court complaint resolution procedure with the CSSF, s/he shall send to the complainant a copy of the present regulation or the reference to the CSSF website, as well as the different means to contact the CSSF to file a request: by website <http://www.cssf.lu>, by mail CSSF Département Juridique II, 283, route d'Arlon, L-1150 Luxembourg, by email [reclamation@cssf.lu](mailto:reclamation@cssf.lu)

The professional shall inform the complainant, on paper or by way of another durable medium, that s/he can file a request with the CSSF and that, in this case, his/her request must be filed with the CSSF within one year after s/he filed his/her complaint with the professional.

In the case of complaints within the meaning of point (5) of Article L. 411-1(1) of the Consumer Code, evidence of the existence and accuracy of the information provided and the date at which it was provided is incumbent on the professional.