

Altum Management Company (Luxembourg) S.A.

Complaints Handling Policy – Executive Summary

Altum Management Company (Luxembourg) S.A. ("Altum") is committed to providing a high standard of service and treating all clients and investors fairly. If a client or investor is dissatisfied with any aspect of our services, they may submit a complaint free of charge.

Altum has established and implemented a **Complaints Handling Policy** (the "**Policy**") designed to ensure that complaints are handled fairly, consistently, transparently and without undue delay, in accordance with applicable Luxembourg laws and regulations.

For the purpose of this Policy a complaint is, as defined in CSSF Regulation 16-07 relating to out of-court complaint resolution, a complaint filed with a professional to recognise a right or to redress a harm. Routine queries such as requests for confirmation, explanation or similar matters are not considered to be a complaint.

Complaints may be submitted either by letter, by telephone or e-mail to the attention of the Complaints Handling Officer using the following contact details:

Altum Management Company (Luxembourg) S.A.
Attention: Complaints Handling Officer
19-21 route d'Arlon
L-8009 Strassen
Grand Duchy of Luxembourg
Email: complaints-manco@altumgroup.com
Tel : +352 27726107

To facilitate the handling of a complaint, the complainant should provide a clear description of the issue (including any step, such as a legal proceeding already taken by the complainant in respect of the complaint) as well as all documents necessary to evidence the identity and capacity of the complainant or its representative.

Altum will acknowledge receipt of the complaint within **10 business days** of receipt and will endeavour to provide a response as soon as possible and, in principle, no later than **one month** after receipt of the complaint. Where additional time is required, the complainant will be informed of the reasons for the delay and the expected timeline for completion of the review.

Where a complainant is not satisfied with the response provided by Altum, or where no response has been received within the applicable timeframe, the complainant may be entitled to refer the matter to the **Commission de Surveillance du Secteur Financier (CSSF)** in accordance with the CSSF's out-of-court complaint resolution procedure (<https://www.cssf.lu/en/customer-complaints/>).

Additional information regarding Altum's Complaints Handling arrangements is available upon request from the Complaints Handling Officer.

**Proprietary information**

The information contained in this document is the exclusive property of Altum Management Company (Luxembourg) S.A. except where otherwise indicated. No part of this document, in whole or in part, may be reproduced, stored, transmitted, or used for any purpose without the prior permission of Altum Management Company (Luxembourg) S.A.

The information contained in this document is subject to change without notice. All Rights Reserved.