



Complaints Policy

Policy name	Complaints Handling Policy
Status	Draft
Department	Compliance / Management
Issue date	6 December 2024
Former policies	Updated Document
Policy responsible	Compliance Officer
Other involved departments	All staff members
Version	1
Revision history	31 December 2022 – new format of the policy 06 September 2023 – yearly review of the policy 6 December 2024 – yearly update and review of Policy



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1. Introduction

The regulation CSSF N° 16-07 of 26 October 2016, (the “Regulation”) imposes on entities subject to the prudential supervision of the CSSF, including Core Capital Management S.A. (“CCM”), certain duties with regards to the proper handling of complaints filed with such entities. In particular, the Regulation imposes on Regulated Entities to define, approve and implement an appropriate complaints handling policy. Such policy must be in written form and be available to all CCM’s employees and its clients. The Complaints Handling Policy detailed in this document (the “Policy”) is designated to provide guidance on the manner in which CCM receives and handles complaints filed by its clients. This Policy also aims to assist CCM’s Management and employees in resolving complaints in an efficient, professional and timely manner. It cannot be excluded that future legal and regulatory provisions or future instructions, recommendations or guidelines from the CSSF will impose additional or different obligations on entities subject to the prudential supervision of the CSSF with regards to proper handling of complaints received by such entities. If necessary, this Policy will be adapted accordingly.

2. Process Description of Compliant Filing

2.1. How to make a complaint

A Complaint should be made in writing. It may be addressed to Clients main point of contact at CCM or to CCM in general. Clients may also chose to initiate Complaint verbally, however written form must always follow. The complaint should be sent to CCM using the following contact details:

By regular mail:

Core Capital Management S.A.
Att: *Your Contact Person*
46, Place Guillaume II
L-1648 Luxembourg
Grand Duchy of Luxembourg

If by email:

Please forward the email to either your Contact person or to: compliance@corecapital.eu

Please also make sure to provide the following information:

2.2. What information and documents to include

Complaint should provide sufficient information to properly identify the Complainant and his/her status as Complainant that would enable CCM to establish the existence of a right of the Complainant against CCM or the prejudice suffered by the Complainant because of an action or the absence of an action from CCM. Complainants are encouraged to provide as much and detailed information and documents regarding the Complaint. The more precise and complete the information and documents regarding the Complaint are, the smoother and faster the complaints handling process will be. In case the Complainant does only



provide part of the information and documents required, CCM will contact the Complainant and provide the list of information and documents that CCM reasonably requires in order to properly handle the Complaint. The failure by the Complainant to provide the reasonably requested information, documents and supporting evidence to CCM may prevent CCM to properly handle a Complaint and may result in a rejection of the Complaint by CCM.

2.3. Acknowledgement of Compliant

CCM shall provide the Complainant with an acknowledgement of receipt of the Complaint within 10 business days in Luxembourg following the receipt of the Complaint.

The acknowledgment of receipt of a Complaint shall include:

- the name and contact details of the person handling the Complaint; and
- either the response from CCM with regards to the Complaint or an indication of the reasonable delay for providing a response to the Complainant, which delay should not exceed one month following the date of receipt of the Complaint by CCM except in exceptional circumstances, which must be duly justified.

2.4. Complaint Handling

CCM endeavors to handle Complaints in a professional manner and by avoiding unnecessary delays. Each Complaint will be addressed in an objective and unbiased manner. Upon receipt of a Complaint, CCM will:

- assess the completeness of the information and documentation sent by the Complainant or whether additional information and/or documents need to be requested from the Complainant;
- assess the seriousness of the Complaint and assess whether the Complaint concerns significant, systemic or recurring issues that request specific action plans that exceed the scope of the relevant Complaint and the scope of this Policy;
- if reasonably possible, estimate the likely delay for sending an adequate response to the Complainant;
- depending on the outcome of point above, decide whether the Complaint needs to be acknowledged prior to providing an adequate response to the Complainant;
- decide on the action plan for preparing an adequate response to the Complainant;
- decide whether to submit the Complaint to the out-of-court complaints procedure of the CSSF;
- monitor the appropriate and timely sending of the adequate response to the Complainant;
- update the record of Complaints and indicate the status of the Complaint as described below.



3. Status of a Complaint

Following statuses are defined:

<i>Pending acknowledgment</i>	Applies to a Complaint received by CCM but for which CCM has not yet provided an acknowledgment of receipt to the Complainant.
<i>Pending response</i>	Applies to a Complaint received and acknowledged by CCM but for which CCM has not yet provided an adequate response to the Complainant.
<i>Replied</i>	Applies to a Complaint received and acknowledged by CCM and for which CCM has provided an adequate response to the Complainant.
<i>Open</i>	Applies to all Complaints that are not classified as closed.
<i>Closed</i>	Applies to all Complaints for which CCM has provided an adequate response to the Complainant: <ol style="list-style-type: none"> 1. for which CCM has provided a response to the Complainant and for which CCM received a formal acceptance by the Complainant of CCM's response; or 2. for which CCM has provided a response to the Complainant and for which CCM received a formal cancellation of the Complaint from the Complainant; or 3. which remained uncommented by the Complainant within a period of one (1) year following the date when the response was sent by CCM.

CCM will monitor the proper handling of all Complaints that have not been closed.

4. Response to and follow up to a Complaint

Once CCM has finalized the review of the Complaint, it will provide an adequate response to the Complainant. CCM may response by regular mail, registered mail, fax or email whatever CCM deems appropriate. CCM will endeavor to provide an adequate response within 1 calendar month following the date of receipt of the Complaint by CCM (or any of its employees) but it might not be possible on all occasions.

Where the review of a Complaint exceeds 1 calendar month following the date of receipt of the Complaint by CCM, the Complainant will be informed of the reasons for the delay and an indication on the date when CCM reasonably believes to be in a position to complete its review and provide an adequate response.



In case the Complainant has not received a response in accordance within the aforementioned delays, the Complainant may request the escalation of its Complaint to the Board by contacting CCM.

The response of CCM shall include:

- the name and contact details of the person in charge of handling the Complaint; and
- in case a Complaint is partially or fully rejected by CCM:
 - complete explanations regarding the decision of CCM to partially or fully reject the Complaint; and
 - in case CCM decides in full discretion to submit the Complaint to the out-of-court complaints procedure of the CSSF:
 - a confirmation that CCM has decided to submit the Complaint to the out-of-court complaints procedure of the CSSF; and
 - a copy of the Regulation or a reference to the CSSF's website; and
 - an information on the means listed in the Regulation for contacting the CSSF for filing a request for the use of the out-of-court complaints procedure of the CSSF;
 - the information that the Complainant may request the escalation of its Complaint to the Board by contacting the Company as specified in point 2.1. above; and
 - the information that the Complainant may file a request to the CSSF for the use of the out-of-court complaints procedure of the CSSF on condition that such request is filed with the CSSF within one (1) year following the date when the Complainant filed its Complaint with CCM.

During the handling process of a Complaint, the Complainant may contact CCM to enquire about the status of its Complaint by contacting CCM as specified in point 2.1. above. being understood that CCM may decline to respond to such enquires in case the Complaint has been submitted i) to the out-of-court complaints procedure of the CSSF or to an out-of-court complaints procedure of any other competent authority or ii) to an arbitration board or iii) to court whether in Luxembourg or abroad.

5. Cooperation in the context of the out-of-court complaints procedure of the CSSF

CCM shall, upon request from the CSSF, provide the cooperation, information, documents, opinions or explanations requested, in accordance with and within the delays as stated in the Regulation.

In accordance with the Regulation, the conclusions of the CSSF are not binding on neither the Complainant nor CCM that remain sovereign to accept or reject the conclusions of the CSSF.



6. Record of Complaints

Each of CCM's employees, including Directors shall forward to the CCM Compliance Officer Complaint received by him. Compliance Officer will keep a record of Complaints received by CCM. Such record will at least contain following information:

- the identity of a Complainant;
- the date on which a Complaint was received by CCM;
- the nature of a Complaint;
- if applicable, the identity of the service provider identified to be most appropriate to respond to a Complaint;
- the nature of the response to a Complaint and the action taken;
- the date of the response to a Complaint;
- the status of a Complaint.

7. Reporting

7.1. Reporting to the Board

At least once per year, Compliance officer will provide the Board with an overview of the Complaints received by CCM and the status of the Complaints. Depending on the degree of seriousness of a Complaint, Compliance Officer may specifically notify the Board and request appropriate decisions from the Board.

7.2. Reporting to the Auditor

Upon request from CCM's independent auditor, Compliance Officer will provide the independent auditor with an overview of the Complaints received by CCM and the status of the Complaints.

7.3. Reporting to the CSSF

On the yearly basis, the Compliance Officer will provide the CSSF with a report covering the previous calendar year and containing:

- the number of Complaints received by CCM; and
- a classification by type of the Complaints received by CCM; and
- a classification by status at the calendar year end of the Complaints received by CCM; and
- a summary report of the Complaints received by CCM and of the actions taken.



The summary report of the Complaints shall not consist in a compilation of summaries of the Complaints but shall present the recurring problems encountered by CCM (if any), and shall contain, if necessary, a report on the measures that have been taken to deal with the Complaints.

8. Data Protection

In the context of the Policy, the Company stores and processes personal data concerning the Complainant. In accordance with applicable laws and regulations protecting personal data (the “**Data Protection Laws**”), the Company only processes personal data concerning the Complainant that is necessary with regard to the Policy. The Complainant shall be allowed access to its personal data collected and shall be entitled to correct such personal data, in accordance with the Data Protection Laws. In order to properly defend its interests and those of its shareholders other than the Complainant, CCM may use, depending on the circumstances of a Complaint and / or of the handling process of a Complaint and under its responsibility, the support of its external counsels, established in the European Union, and may, in these circumstances, communicate personal data to such Delegates and external counsels in accordance with the Data Protection Laws.

9. Entry Into Force

This policy is valid as of 6 December 2024.