



VIMCO LUXEMBOURG  
S.A.  
VALUE & WEALTH MANAGEMENT

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# COMPLAINTS HANDLING POLICY

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Author:	R. Rutten & M.W.A.J. Gielkens

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## Foreword

Vimco aims to treat its clients and business relations with the highest level of professionalism. This includes an adequate, transparent and objective treatment of complaints. Providing an appropriate response to these complaints an essential component to maintain a relationship based on mutual trust.

This Complaints Handling Policy aims to provide both managers and employees of Vimco and Vimco's clients and business relationships clear guidelines to resolve complaints in an efficient, professional and timely manner.

This definition and implementation of this Complaints Handling Policy is the overall responsibility of the Vimco Board of Directors.

In compliance with laws and regulations, Vimco shall ensure that this complaints handling policy is available to its Board of Directors, its managing directors and its employees as well as its clients and the general public. The policy shall be included on the corporate website and (potential) clients shall be made aware of the complaints handling procedure when signing their asset management agreement.

## I. How should a Complaint be made

A complaint should be made in writing and should include the complainants first and last name, address, city, postal code, country, e-mail address and phone number. Furthermore, the complainant should specify his or her relationship with Vimco. Finally, the document should be provided of the complainants signature. For reference, the attached complaint form enclosed in the appendix can be used.

The complaint should be sent to Vimco via e-mail address [info@vimcolux.com](mailto:info@vimcolux.com). If the complainant wishes to send the complaint via regular postage, it should be sent to Vimco's corporate office:

Vimco Luxembourg S.A.  
5, Om Knupp  
L-9991 Weiswampach  
Luxembourg

## II. What Information and Documents are required when making a Complaint

In order for Vimco to adequately process the complaint, the complainant should provide a detailed description of his complaint and copies of the documents supporting his/her complaint so that Vimco can provide an adequate resolution. The more detailed, precise and complete the information is, the smoother and faster the complaints handling process will be.

If Vimco has insufficient information to resolve a complaint, the company will contact the complainant and request a specified list of additional information it reasonably requires to properly handle the complaint. If the complainant is not able or willing to provide this additional information, Vimco may not be able to handle the complaint and will therefore have to reject it.

## III. How will a Complaint be Acknowledged

Vimco shall provide the complainant with an acknowledgement of receipt of the complaint within 10 business days, provided the company has not already responded to this complaint within this period. This response shall include the name and contact details of the Vimco employee handling the complaint and either Vimco's response to the complaint or an indication when the complainant can reasonably expect a response to his/her complaint.

## IV. Handling of a Complaint

Vimco aims to handle complaints in a professional and timely manner. Each complaint will be addressed in a fair, objective and unbiased manner.

Upon receipt of a complaint, Vimco will assess the completeness of the information and documentation sent by the complainant and identify whether additional information or documents are required. Consequently, Vimco will 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. Vimco will then estimate the time it reasonably needs to formulate an adequate response to the complainant.

Subsequently, Vimco will decide on the action plan for preparing an adequate response to the complainant and decide whether the complaint should be submitted to the out-of-courts complaints procedure of the Commission de Surveillance du Secteur Financier (CSSF).

Vimco's management will monitor and ensure that a complaint is handled properly, timely and in a fair, objective and unbiased manner.

## **V. Response to a Complaint and Follow-up**

After finalizing the review of the complaint, Vimco will provide an adequate response. The response shall include the name and contact details of the person handling the complaint and a detailed explanation regarding the decision of the company concerning the complaint.

In case the complaint has been submitted to the out-of-courts complaints procedure of the CSSF, Vimco will inform the complainant and explain the relevant steps of this procedure, including a copy of the relevant CSSF regulation procedure.

If the complainant is not satisfied with the handling of the complaint, he/she can appeal Vimco's decision with the Vimco Board of Directors.

Furthermore, the complainant has the possibility to file a request to the CSSF for the use of the out-of-court complaints procedure of the CSSF, on condition that such a request is filed with the CSSF within one year after filing the complaint with Vimco.

## **VI. Cooperation Duty of Vimco in the Context of the Out-of-court Complaints Procedure of the CSSF**

Vimco 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 CSSF regulations. As stated in said regulations, the conclusions of the CSSF are not binding on neither the complainant nor the company that remain sovereign to accept or reject the conclusions of the CSSF.

## **VII. Record of Complaints**

Vimco shall keep a record of all formal, written complaints received by the company. This record shall include the identity of a complainant, the date and nature of the complaint, the nature of Vimco's response and the actions taken and the date of the response to the complainant.

## **VIII. Reporting**

### **A. Reporting to the Board of Directors**

At least once per year, the Vimco managing directors shall provide the Board of Directors with an overview of formal complaints received by the company, as well as the nature and current status of these complaints. Complaints will be reported to the Chairman of the Board on a weekly basis.

### **B. Reporting to the Auditor**

Upon request from the independent auditor, Vimco will provide the auditor with an overview of the formal complaints received by the company and the status of the complaints.

### C. Reporting to the CSSF

Vimco will provide the CSSF with a detailed overview of the complaints once a year. Specifically, this overview will include the number of formal complaints, a classification by type of complaints, a classification by status of the complaints, and a summary report of the complaints and the actions taken by Vimco. If no complaints have been filed, this will be reported to the CSSF as well. Vimco shall file these complaint reports on the preceding calendar year no later than before the end of the second month of the calendar year.

## IX. Data Protection

In the context of this Complaints Handling Policy, Vimco stores and processes personal data concerning the complainant. In accordance with applicable laws and regulations protecting personal data, Vimco only processes personal data concerning the complainant that is necessary with regard to this policy.

The complainant shall be allowed access to his/her personal data collected and shall be entitled to correct such personal data if desired, in accordance with the data protection laws.

In order to properly defend its interests, Vimco 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 delegates and/or the support of 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.

## X. Appendix 1: Template Complaint Form

This document is to be read in conjunction with the policy regarding complaints handling adopted by the Company and it aims at facilitating the task of a complainant when bringing a complaint against the Company.

A complete description of the complaint handling policy implemented by the Company is available upon request. Please contact the Company as detailed hereafter.

**The present form should be sent to the Company as follows:**

If by regular mail:	If by e-mail:
Vimco Luxembourg S.A. Attn. the Complaints Officers 5, Om Knupp L-9991 Weiswampach Grand Duchy of Luxembourg	Vimco Luxembourg S.A. Attn. the Complaints Officers E-mail address: <a href="mailto:info@vimcolux.com">info@vimcolux.com</a>

**Identity and contact details of the complainant (please complete the marked boxes as appropriate)**

In case of a person:

In case of a legal entity:

First name		
Last name		
Legal denomination		
Date of birth		
Place of birth		
Address line 1		
Address line 2		
Address line 3		
City		
Postal code		
Country		
E-mail		
First name of contact person		
Last name of contact person		
E-mail of contact person		

I am filling out this complaint in my own name and for my own account (please confirm by ticking the box)	<input type="checkbox"/>
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<p>Please list the supporting evidence attached to this complaint form and documents that enable the Company to assess your capacity as a complainant</p>	
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**Description of the complaint**

<p>Please provide detailed information and a copy of the documents supporting your complaint by describing the right you have against the Company that you request to be recognized or the prejudice suffered by you because of an action or the absence of an action of the Company that you request to be rectified.</p>	
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Place: \_\_\_\_\_

Date: \_\_\_\_\_

Name(s): \_\_\_\_\_

Signature(s) \_\_\_\_\_

Title(s) \_\_\_\_\_