

## COMPLAINTS POLICY

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Spirit Asset Management is committed to providing a professional and high quality service that meets the expectations and interests of its clients.

However, if a client feels dissatisfied with Spirit Asset Management's investment services, he/she has the possibility to express his/her dissatisfaction. A complaint in the sense of these provisions is not considered to be a request relating to events of minor importance that have already been resolved, a request for information or clarification.

For this purpose, the client may send a letter to his relationship officer or to the compliance department in writing (post, email or fax) which should contain the following details:

- identity and contact details of the applicant
- account number with the custodian bank or date of the management mandate
- description of the facts and related documentation/correspondence
- any other relevant details.

The complaint may be sent to the following address:

Spirit Asset Management S.A.  
To the attention of the Compliance department  
31-33 avenue Pasteur  
L-2311 Luxembourg

Or using the following fax number : +352 264 704 30.

Within 10 days, the client will receive an acknowledgement of receipt of the letter and the contact details of the person handling the request.

Within 30 working days from the date of receipt of the letter, the client will receive a reply from Spirit Asset Management.

If, however, the client feels that he/she has not received a complete or satisfactory response to his/her request, he/she may express his/her dissatisfaction to the Compliance department of Spirit Asset Management who is responsible to the regulatory authorities for the processing of claims.

If the client is still not satisfied with the outcome of his/he complaint, he/she has a period of one month (from the date on which his complaint was received by Spirit Asset Management) to write to the CSSF - Commission de Surveillance du Secteur Financier (<http://www.cssf.lu>), which may intervene as an out-of-court dispute resolution body.

The requirements to be met and the documents to be provided in the context of this recourse to the CSSF are available on the CSSF website <https://www.cssf.lu/en/customer-complaints/> or can be requested to your relationship officer.