

**Ipes (Luxembourg) S.A.**

*(Ipes is now part of Apex Group Ltd.)*

The purpose of this policy is to provide clear, precise and up-to-date information on Ipes (Luxembourg) S.A. ("Ipes") complaints 'handling procedures in accordance with CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints. The policy is intended to ensure that complaints are dealt with properly and promptly.

This policy is also applicable to the collective investment vehicles under an Administration Services agreement with Ipes.

**1. WHAT IS A COMPLAINT?**

A complaint is an expression of dissatisfaction made to Ipes that is related to the services provided by Ipes or to the complaints-handling process itself and where a response or resolution is explicitly or implicitly expected by the complainant.

At times, complaints can be expressed by way of negative feedback, which may not require a resolution or formal follow-up.

While Ipes recognizes that this type of feedback is valuable, the Policy does not apply to feedback of this nature.

Any person, for any reason, willing that Ipes recognise a right or redress a harm in relation to its services must contact Ipes to file a complaint.

**2. HOW TO MAKE A COMPLAINT?**

A complaint can be made by phone or in writing (post or email). The complainant shall explain in detail the facts behind the complaint, providing all relevant supporting documentation if applicable.

Your complaint will be reported to the designated Complaints 'handling Officer, who is the Managing Director of Ipes, Mr Simon HENIN.

If sending the complaint by post, it should be sent to the following address:

**Ipes (Luxembourg) S.A.**

To the attention of: Mr. Simon HENIN

2-8, Avenue Charles de Gaulle

L-1653 Luxembourg

For complaints by email, please send to: [lux.complaints@ipes.com](mailto:lux.complaints@ipes.com).

For complaints by phone, please call the following telephone number:

Tel: +352 24 87 01

When making a complaint, please provide the following information:

- Your name, position and contact details
- Your relationship with Ipes
- Your contact person within Ipes and if applicable, details of the Ipes employee involved
- A written summary of the complaint (including when the conduct giving rise to the complaint occurred)
- Copies of any documentation supporting the complaint

### **3. PRINCIPLES**

- There will be no charge to the complainant for making a complaint;
- Personally identifiable information concerning the complainant is actively protected from disclosure unless the complainant expressly consents to its disclosure;
- Each complaint is addressed in an equitable, objective and unbiased manner through the complaints-handling process.

### **4. COMPLAINTS' HANDLING PROCESS**

Ipes will acknowledge the complaint within 10 business days after receipt and will inform the Complainant of the name and contact details of the person handling the complaint.

Ipes will also inform the complainant of the follow-up given to the complaint.

A final written response will be sent to the complainant no later than one month after receipt of the complaint.

Where a response cannot be provided within the prescribed period of one month, the complainant will be informed of the cause for the delay with an indication of the date by which the investigation will be completed and a final response issued.

### **5. RECOURSE TO CSSF'S OUT-OF-COURT RESOLUTION OF COMPLAINTS**

Where the complainant did not receive a satisfactory resolution within one month after receipt of the complaint by Ipes, he/she may file an out-of-court resolution request to the CSSF within one year after he/she filed his/her complaint with Ipes.

The request must be filed with the CSSF in writing, by post, by fax, by email (to the address/number available on the CSSF website), or online on the CSSF website. In order to facilitate the filing of a request, the CSSF publishes a form on its website.

A detailed procedure for such resolution will be made available to the complainant upon request to Ipes.