



Executive Summary of the
Complaint Policy and Procedures for
Citco Fund Services (Luxembourg) S.A.

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CITCO

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1. Introduction

Citco Fund Services (Luxembourg) SA (“CFSLU”) believes in developing long-term relationships with its clients and strives to provide them with the best possible service. Furthermore, CFSLU is a learning organisation and wants to constantly improve the products and services it provides to its clients. CFSLU also believes that to maintain solid and prosperous business relationships, it is necessary to address and resolve complaints in a consistent, satisfactory and timely manner.

2. Purpose of this document

In accordance with CSSF Regulation 16-07 and CSSF Circular 17/671, CFSLU has drafted an internal policy for complaints resolution, and hereby communicates this executive summary of its Complaints Resolution Policy to its clients, business counterparts and prospects. This document addresses how CFSLU deals with complaints lodged by its clients and their relevant counterparties.

3. CFSLU clients and activity

CFSLU provide services to various types of unitized and non-unitized investment or pooled asset vehicles. The legal form of these vehicles can vary from jurisdiction to jurisdiction but typically include, without limitation, companies, unit trusts, partnerships and other such entities (hereafter collectively referred to as “**Funds**”). Each Fund and investors of these funds will enter into an agreement, directly or indirectly with CFSLU (or will enter into an agreement, in the case of a prospective client) which sets out the terms and conditions of the arrangement as well as the services that CFSLU will provide.

4. The Purpose of the CFSLU Complaints Resolution Policy

The purpose of the Policy is to provide a set of internal policies, procedures and controls all of which are based on Article 15 of the CSSF Regulation 16-07 on out-of-court resolution of complaints.

The Policy aims to ensure that CFSLU is compliant with the CSSF Regulation 16-07 and that complaints are handled in a systematic, consistent and documented way.

According to the CSSF Regulation 16-07 a “Complaint” is defined as a complaint filed with a professional, in this case CFSLU, to recognize a right or to redress a tort. CFSLU will consider complaints typically received via e-mail or letter.

5. Core features of the Policy

5.1 Resolution of Client Complaints

CFSLU recognizes that Article 15 of CSSFR 16-07 allows for no longer than ten business days to acknowledge a client complaint.

5.2 Contact person at CFSLU

The usual Citco contact person of the client within CFSLU is the contact person with whom the client should communicate. In accordance with Article 15 of CSSFR 16-07 CFSLU will provide this information if it is not readily known. In principle, this person will be the Senior Account Manager of the Client. Resolution of the complaint will be in principle within one month of its initial receipt. Where an answer cannot be provided within this period, CFSLU will inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

5.3 Responsible person within the Executive Management

CFSLU has designated a responsible person within its Executive Management who ensures that each complaint is properly recorded and handled in accordance with the CFSLU Complaints handling policy and the applicable Luxembourg regulation. Each complainant has the right to rise his complaint up to this responsible person at the level of the Executive Management.

5.4 Referral of Complaint to the CSSF

Where the complainant does not receive a satisfactory resolution from CFSLU, CFSLU recognizes the right of the client to refer the complaint to the CSSF for out-of-court resolution, and must inform the complainant of this right in accordance with the CSSF Regulation 16-07. The procedure for referral to the CSSF is governed by article 5 (2) of the CSSF Regulation 16-07.