



## CLAIM TREATMENT

Treatment device of claims relating to our services:  
Engelwood has a procedure for the effective consideration and proper handling of complaints.

### **Your contact persons**

For any claim, please contact:

1. primarily your usual contact person,
  2. or directly to Engelwood Asset Management, to the attention of the Management.
- In all cases, your claim will be transmitted to the Director responsible for processing the claims of our company.

### **Required information**

In order to ensure an efficient processing of your claim, please specify in your claim the following information:

- The exact nature of your claim,
- Your full civil status and address,
- Any other references or copies of documents that might be useful. We advise you to keep a copy of your requests and responses which will be sent to you.

### **The processing delays of your claim**

The acknowledgment of receipt: 10 days

You will receive an acknowledgment of receipt of your request within a maximum of 10 working days from receipt thereof, unless the treatment can be achieved within that period, in which case you will receive a response to your claim within this period of 10 days.

The answer: one month

Within one month of the date of receipt of your claim, you will receive an answer. If additional information is required to process your claim, this period of one month will be suspended during the needed time to receive additional documents or information. If the claim cannot be processed by us within this period of one month, we will contact you to explain the reasons for this delay and to give you an estimated date of answer.

The mailing address to send your claim to the relevant Engelwood entity:

- Engelwood Asset Management S.A. - [complaints@engelwood.eu](mailto:complaints@engelwood.eu)

Action before the Luxembourg Supervisory Authority of the Financial Sector (CSSF)  
(Only applicable for Engelwood entities under the supervision or control of the CSSF)  
If a disagreement persists after our reply, you can, without renouncing to other judiciary action, seek the CSSF.

Please find with the following link, a presentation and the detailed applicable procedure in this context with the CSSF, as described in Regulation CSSF 16-07 and in the CSSF circular 17/671 on alternative dispute resolution for claims:

<http://www.cssf.lu/en/consumer/complaints/>

Please find its main aspects as follows:

1. First requirement: you must have sent your claim in writing to our company and not have received any reply or any satisfactory answer at the end of the period of one month abovementioned.

2. The application must be submitted in writing either by post to the address of the CSSF (published on the website) or by fax sent to the CSSF (published on its website) or by email (at the address published on their website), or online via the website of the CSSF.
3. In order to facilitate the introduction of an application, the CSSF provides an application form on its website (see link above); the request must be substantiated and accompanied by a set of documents listed in the Regulations CSSF 16/07 and also in the application form.
4. The application shall be written in Luxembourgish, French, German or English.
5. If the request is deemed non-admissible by the CSSF, a justification of non-admissibility is sent to the applicant within three weeks of receipt of the claim. Otherwise, the CSSF confirms in writing to the applicant that the file is admissible and complete, and forwards a copy to the professional to take position and give an answer within one month.
6. The CSSF begins the analysis of the claim upon receiving the response from the professional. The CSSF may request additional documents / information. The parties keep their own original documents as evidence. The CSSF has 90 days to issue its opinion, from the date the claim file is complete. The period may be extended in cases of complex claims, provided that, in such case, the applicant and the professional are informed by the CSSF in writing before the end of the initial 90-days period.
7. The procedure is essentially written. However, the CSSF may suggest an interview involving the applicant, the professional, their respective lawyers and/or representatives and the CSSF.
8. The CSSF sends a notice and its motivation in writing to both parties:
  - If the request is wholly or partly based, the CSSF suggests an out-of-court settlement of the claim. Parties are not compelled to follow the opinion of the CSSF, but they must inform the CSSF of their decision in this context.
  - Otherwise, if the parties maintain irreconcilable positions or if they refuse to follow the opinion of the CSSF, it is suggested to act before the courts.
9. The out of court procedure may close in advance, with information to the CSSF, in the following cases:
  - The applicant waives his claim in writing.
  - The applicant and the professional reach an agreement before the CSSF gives its opinion.
  - The right that the applicant intends to defend is prescribed.
  - A court, arbitrator or other extrajudicial body in Luxembourg or abroad is seized of the claim.
  - The applicant has not submitted any evidence or required explanation to the CSSF within a maximum of 45 days.
10. To ensure the impartiality of the CSSF in the settlement of the claim, any agent of the CSSF who notices the existence of a conflict of interest in dealing with the claim must report it to his superiors in order to be withdrawn from the application if necessary.