

## SUMMARY OF INVESTORS RIGHTS

Engelwood Asset Management Société Anonyme (hereafter referred to as “Engelwood Asset Management S.A.” or “AIFM”) is a Luxembourg based Alternative Investment Fund Manager, authorised under the Law of 12 July 2013 on alternative investment fund managers.

This document is intended as a Summary of your key Investors Rights in relation to Fund(s) managed by the AIFM, in accordance with Article 4 of the Regulation (EU) 2019/1156 on facilitating cross-border distribution of collective investment undertakings (“CBDF”). This document is not intended to be and should not be considered as an exhaustive list of all rights which investors may be entitled to in relation to the Fund(s).

### 1. Entitlement to make an individual complaint

#### a. Liaising with Engelwood Asset Management S.A.

As an investor in a Fund(s) managed by the AIFM, you are entitled to make a complaint free of charge in your language. Any such complaint must be handled by the AIFM promptly and effectively.

You will be able to provide us with your detailed complaint either:

- in writing to: Engelwood Asset Management S.A., 11, rue Eugène Ruppert, L-2453 Luxembourg, Grand Duchy of Luxembourg.
- by email to: [complaints@engelwood.eu](mailto:complaints@engelwood.eu)

Further information on the AIFM’s complaints policy is available at <https://engelwoodgroup.com/wp-content/uploads/2022/10/EAM-Claim-Treatment.pdf>

#### b. Out-of-court complaint resolution with the CSSF

If after discussing with us, you still wish to proceed with an out of court complaint resolution, you may file your complaint with the CSSF only when it relates to a Luxembourg supervised entity (meaning Engelwood Asset Management S.A. authorised as an AIFM in Luxembourg).

#### c. Out-of-court complaint resolution related to a financial service provider in your country

If your complaint relates to a financial service provider in your country of residence, such as a bank, an insurance company, an investment firm (e.g. a portfolio manager, an investment advisor ...), you must first address your complaint to this financial service provider.

If after discussing with this entity, you still wish to proceed with an out of court complaint resolution, you may file a complaint directly to the appropriate Ombudsman of your country for the specific type of intermediary.

Please find the main Ombudsman (or equivalent) in your country (not an exhaustive list). Please verify that the entity for which you have a complaint is a member of this Ombudsman.

Country	Name	Types of intermediaries	Contact	Website	Language s
Austria	Gemeinsame Schlichtungsstelle der österreichischen Kreditwirtschaft  (Conciliation Board of the Austrian Banking Industry=	Mortgage banks, payment institutions, investment providers, most banks, most credit unions.	<a href="mailto:office@bankenschlichtung.at">office@bankenschlichtung.at</a>	<a href="http://www.bankenschlichtung.at">www.bankenschlichtung.at</a>	German, English
	Schlichtung für Verbrauchergeschäfte  (Arbitration board for consumer businesses)	Mortgage intermediaries, insurance companies, insurance intermediaries, investment intermediaries, pension intermediaries, some banks, some mortgage banks, some credit unions, some investment providers, some pension providers.	<a href="mailto:office@verbraucherschlichtung.at">office@verbraucherschlichtung.at</a>	<a href="http://www.verbraucherschlichtung.at">www.verbraucherschlichtung.at</a>	German
Belgium	Ombudsfm	Banks, mortgage banks, credit unions, investment providers, investment intermediaries, securities intermediaries.	<a href="mailto:ombudsman@ombudsfm.be">ombudsman@ombudsfm.be</a>	<a href="http://www.ombudsfm.be">www.ombudsfm.be</a>	Dutch, French, English, German

	Ombudsman des Assurances (Insurance Ombudsman)	Insurance companies, some mortgage intermediaries, some pension intermediaries.	<a href="mailto:info@ombudsman.as">info@ombudsman.as</a>	<a href="http://www.ombudsman-insurance.be">www.ombudsman-insurance.be</a>	Dutch, French, English, German
<b>Cyprus</b>	Κυπριακό Κέντρο Εναλλακτικής Επίλυσης Διαφορών (Cyprus Consumer Center for Alternative Dispute Resolution)	Payment account and payment services, consumer loans, mortgage loans, savings, investments, pensions and securities, life and non-life insurance.	<a href="mailto:secretariat@adr.com.cy">secretariat@adr.com.cy</a>	<a href="http://www.adrcyprus.com/en/">www.adrcyprus.com/en/</a>	Greek, English
<b>Denmark</b>	Ankenævnet for Fondsmæglerselskaber (Complaint Board of Danish Securities and Brokering Companies)	Most investment intermediaries.	<a href="mailto:sek@fanke.dk">sek@fanke.dk</a>	<a href="http://www.fanke.dk">www.fanke.dk</a>	Danish, English, Swedish, Norwegian
	Det finansielle ankenævn (Danish Financial Complaint Board)	Banks, mortgage institutions and investment funds.	<a href="mailto:sek@fanke.dk">sek@fanke.dk</a>	<a href="http://www.fanke.dk">www.fanke.dk</a>	Danish, English, Swedish, Norwegian
	Ankenævnet for Forsikring (Danish Insurance Complaints Board)	Insurance companies, most pension providers.	<a href="mailto:ankeforsikring@ankeforsikring.dk">ankeforsikring@ankeforsikring.dk</a>	<a href="http://www.ankeforsikring.dk">www.ankeforsikring.dk</a>	Danish, English
<b>Finland</b>	Sijoituslautakunta (Investments Complaints Board)	Banks, mortgage banks, mortgage intermediaries, securities intermediaries, most investment providers, most investment intermediaries.	<a href="mailto:info@fine.fi">info@fine.fi</a>	<a href="http://www.fine.fi">www.fine.fi</a>	Finnish, Swedish, English
	Kuluttajariitalautakunta (Consumer Disputes Board)	Banks, mortgage banks, mortgage intermediaries, credit unions, insurance companies, insurance intermediaries, some investment providers, some investment intermediaries, some pension providers, some pension intermediaries.	<a href="mailto:kuluttajavi@om.fi">kuluttajavi@om.fi</a>	<a href="http://www.kuluttajariita.fi/fi/">www.kuluttajariita.fi/fi/</a>	Finnish, Swedish, English
	Pankkilautakunta (Finnish Banking Complaints Board)	Banks, mortgage banks, mortgage intermediaries, credit unions.	<a href="mailto:info@fine.fi">info@fine.fi</a>	<a href="http://www.fine.fi">www.fine.fi</a>	Finnish, Swedish, English
	Vakuutuslautakunta (Finnish Insurance Complaints Board)	Insurance companies, most insurance intermediaries, most pension providers, most pension intermediaries.	<a href="mailto:info@fine.fi">info@fine.fi</a>	<a href="http://www.fine.fi">www.fine.fi</a>	Finnish, Swedish, English
<b>France</b>	Médiateur de l'Autorité des Marchés Financiers - AMF (AMF Ombudsman)	Investment providers, most investment intermediaries, most securities intermediaries, some pension providers	On AMF website, go to Ombudsman / Médiateur, Access Form	<a href="http://www.amf-france.org">www.amf-france.org</a>	French, English
	Médiateur de l'Association française des Sociétés Financières- ASF (Mediator of the French Association of Specialised Finance Companies)	Most credit unions, some banks, some mortgage banks	<a href="mailto:mediateur@asf-france.com">mediateur@asf-france.com</a>	<a href="http://www.lemediateur.asf-france.com">www.lemediateur.asf-france.com</a>	French, English

	Médiateur de l'Assurance (Insurance Mediator)	Insurance companies, some credit unions, some insurance intermediaries, some pension providers	<a href="mailto:le.mediateur@mediation-assurance.org">le.mediateur@mediation- assurance.org</a>	<a href="http://www.mediation-assurance.org">www.mediation- assurance.org</a>	French, English
<b>Germany</b>	Ombudsstelle für Sachwerte und Investmentvermögen e.V.  (Real Asset Investment Arbitration Board)	Alternative investment fund managers (AIFM), providers of closed-end funds, trust companies, alternative investment funds, closed-end funds	<a href="mailto:info@ombudsstelle.com">info@ombudsstelle.com</a>	<a href="http://www.ombudsstelle.com">www.ombudsstelle.com</a>	German, English
	Ombudsmann der deutschen genossenschaftlichen Bankengruppe - BVR  (Ombudsman of German Cooperative Banks)	Most banks, some mortgage banks: payments, deposits, credit & loans, mortgages, investments, some securities.	<a href="mailto:kundenbeschwerdestelle@bvr.de">kundenbeschwerdestelle @bvr.de</a>	<a href="http://www.bvr.de">www.bvr.de</a>	German, English
	Deutscher Sparkassen- und Giroverband - DSGV  (German Savings Banks Association)	Only German savings banks: payments, deposits, credit & loans, mortgages, investments, pensions, securities offered by German savings banks.	<a href="mailto:schlichtung@dsgv.de">schlichtung@dsgv.de</a>	<a href="http://www.dsgv.de">www.dsgv.de</a>	German, English
	Ombudsmann der öffentlichen Banken Deutschlands - VÖB  (Ombudsman of German Public Sector Banks)	Some banks: payments, deposits, credit & loans, mortgages, investments, some securities.	<a href="mailto:ombudsmann@voeb-kbs.de">ombudsmann@voeb- kbs.de</a>	<a href="http://www.voeb.de/de/ueber_uns/ombudsmann">www.voeb.de/de/ueber un s/ombudsmann</a>	German, English, French
	Ombudsmann der privaten Banken  (Ombudsman Scheme of the Private Commercial Banks)	Most banks, most mortgage banks: payments, deposits, credit & loans, investments, pensions, securities	<a href="mailto:ombudsmann@bdb.de">ombudsmann@bdb.de</a>	<a href="http://www.bankenombudsmann.de/ombudsmann">www.bankenombudsmann .de/ombudsmann</a>	German, any other language agreed on by the customer and bank
	Ombudsmann Private Kranken- und Pflegerversicherung  (Ombudsman Private Health and Long-term Care Insurance)	Private health insurance, private long-term care insurance, some non-life insurance.	Complaints can be sent via internet by filling in a specific form	<a href="http://www.pkv-ombudsmann.de">www.pkv-ombudsmann.de</a>	German
	Ombudsstelle für Investmentfonds  (Ombudsman Scheme for Investment Funds)	Some investment providers, some banks and some depositaries	<a href="mailto:info@ombudsstelle-investmentfonds.de">info@ombudsstelle- investmentfonds.de</a>	<a href="http://www.ombudsstelle-investmentfonds.de">www.ombudsstelle- investmentfonds.de</a>	German, English
	Schlichtungsstelle bei der Deutschen Bundesbank  (Arbitration Board at the Deutsche Bundesbank)	Mortgage intermediaries, investment providers, investment intermediaries, securities intermediaries, some banks, some mortgage banks, some credit unions	<a href="mailto:schlichtung@bundesbank.de">schlichtung@bundesban k.de</a>	<a href="http://www.bundesbank.de">www.bundesbank.de</a>	German
	Schlichtungsstelle bei der Bundesanstalt für Finanzdienstleistungsaufsi cht - BaFin  (Arbitration Board at BaFin)	All institutions under supervision of BaFin	<a href="mailto:schlichtungsstelle@bafin.de">schlichtungsstelle@bafin .de</a>	<a href="http://www.bafin.de">www.bafin.de</a>	German
	Versicherungsombudsman n e.V.	Insurance companies, insurance intermediaries	<a href="mailto:beschwerde@versicherungsombudsmann.de">beschwerde@versicheru ngsombudsmann.de</a>	<a href="http://www.versicherungsombudsmann.de">www.versicherungsombud smann.de</a>	German, English, French

	(Insurance Ombudsman)				
<b>Greece</b>	Ελληνικός Χρηματοοικονομικός Μεσολαβητής – Αστική Μη Κερδοσκοπική Εταιρεία Εναλλακτικής Επίλυσης Διαφορών (EXM-ΕΕΕΕΔ)  (Hellenic Financial Ombudsman – Nonprofit Alternative Dispute Resolution Organisation (HFO – ADRO))	Banks, investment services companies, portfolio investment companies, mutual funds, brokerage firms.	<a href="mailto:info@hobis.gr">info@hobis.gr</a>	<a href="http://www.hobis.gr">www.hobis.gr</a>	Greek, English
<b>Italy</b>	Arbitro per le Controversie Finanziarie - ACF  (Securities and Financial Ombudsman)	Banks, credit unions, some insurance companies, some investment providers, most investment intermediaries, most securities intermediaries, depositaries	<a href="mailto:info.acf@consob.it">info.acf@consob.it</a>	<a href="http://www.acf.consob.it">www.acf.consob.it</a>	Italian, English
	Conciliatore Bancario Finanziario  (Banking Ombudsman)	Banks, investment providers, investment intermediaries	<a href="mailto:segreteria@conciliatorebancario.it">segreteria@conciliatorebancario.it</a>	<a href="http://www.conciliatorebancario.it">www.conciliatorebancario.it</a>	Italian, French, English, Spanish
	Istituto per la Vigilanza sulle Assicurazioni - IVASS  (Insurance Supervisory Authority)	Insurance companies, insurance intermediaries.	<a href="mailto:scrivi@ivass.it">scrivi@ivass.it</a> <a href="mailto:ivass@pec.ivass.it">ivass@pec.ivass.it</a>	<a href="http://www.ivass.it/">www.ivass.it/</a>	Italian, English
	Arbitro Bancario Finanziario - ABF  (Banking and Financial Ombudsman)	Banks, mortgage banks, mortgage intermediaries, credit unions, payment institutions, electronic money institutions, Poste Italiane S.p.A.	<a href="mailto:abf@bancaditalia.it">abf@bancaditalia.it</a> <a href="mailto:roma.abf.segreteriatecnica@bancaditalia.it">roma.abf.segreteriatecnica@bancaditalia.it</a>	<a href="http://www.arbitrobancariofinanziario.it">www.arbitrobancariofinanziario.it</a>	Italian, English
<b>Luxembourg</b>	Commission de Surveillance du Secteur Financier - CSSF	Banks, mortgage banks, investment providers, investment intermediaries	<a href="mailto:direction@cssf.lu">direction@cssf.lu</a>	<a href="http://www.cssf.lu/en/">www.cssf.lu/en/</a>	French, German, English
<b>Netherlands</b>	Klachteninstituut Financiële Dienstverlening - Kifid  (Financial Services Complaints Institute)	Banks, insurance companies, insurance intermediaries, most mortgage banks, most mortgage intermediaries, most credit unions, some investment providers, some investment intermediaries, some pension intermediaries, some securities intermediaries	<a href="mailto:consumenten@kifid.nl">consumenten@kifid.nl</a>	<a href="http://www.kifid.nl">www.kifid.nl</a>	English
<b>Portugal</b>	Comissão do Mercado dos Valores Mobiliários - CMVM  (Portuguese Securities Market Commission)	Banks, credit unions, investment providers, investment intermediaries, securities intermediaries, most insurance companies	<a href="mailto:cmvm@cmvm.pt">cmvm@cmvm.pt</a>	<a href="http://www.cmvm.pt/PIInstitucional/">www.cmvm.pt/PIInstitucional/</a>	Portuguese
	Centro de Arbitragem de Conflitos de Consumo de Lisboa  (Lisbon Arbitration Centre for Consumer Conflicts)	Banks, mortgage banks, mortgage intermediaries, credit unions, insurance companies, insurance intermediaries, some investment providers,	<a href="mailto:director@centroarbitragemlisboa.pt">director@centroarbitragemlisboa.pt</a>	<a href="http://www.centroarbitragemlisboa.pt">www.centroarbitragemlisboa.pt</a>	Portuguese, English, Spanish, French

		some investment intermediaries			
<b>Spain</b>	Oficina de Atención al Inversor - Dirección de Inversores de la CNMV  (Investor Assistance Office – Investors Division of the CNMV)	Banks, investment providers, investment intermediaries, securities intermediaries	<a href="mailto:Serviciodereclamacion.esCNMV@cnmv.es">Serviciodereclamacion.esCNMV@cnmv.es</a>	<a href="http://www.cnmv.es/portal/Inversor/In_dice.aspx">www.cnmv.es/portal/Inversor/In_dice.aspx</a>	Spanish, English
	Servicio de Reclamaciones de la Dirección General de Seguros y Fondos de Pensiones - DGSFP  (Complaints Service of the Directorate - General of Insurance and Pension Funds)	Insurance companies, insurance intermediaries, pension providers, pension intermediaries	<a href="mailto:reclamaciones.seguros@mineco.es">reclamaciones.seguros@mineco.es</a>	<a href="http://www.dgsfp.mineco.es/reclamaciones/index.asp">www.dgsfp.mineco.es/reclamaciones/index.asp</a>	Spanish
	Departamento de Conducta de Entidades (Banco de España)  (Institutions' Conduct Department of the Banco de España)	Banks, savings banks, credit co-operatives, payment institutions and some others	<a href="mailto:conducta.entidades@bde.es">conducta.entidades@bde.es</a>	<a href="http://www.bde.es/bde/es/secciones/servicios/Particulares_y_e/Servicio_de_Recl">www.bde.es/bde/es/secciones/servicios/Particulares_y_e/Servicio de Recl</a>	Spanish, English
<b>Sweden</b>	Allmänna reklamationsnämnden - ARN  (National Board for Consumer Disputes)	Banks, mortgage banks, mortgage intermediaries, credit unions, insurance companies, insurance intermediaries, investment providers, investment intermediaries, pension providers, pension intermediaries, securities intermediaries.	<a href="mailto:arn@arn.se">arn@arn.se</a>	<a href="http://www.arn.se">www.arn.se</a>	Swedish, Danish, Norwegian and, in principle, English

#### d. Liaising with the FIN-NET

If you have a cross-border complaint related to financial service provider, such as a bank, an insurance company, an investment firm located in another EU/EEA country than yours, you may either:

- Contact the local Ombudsman at that country (please refer to the table above) or
- Place your complaint via FIN-NET, which is an EU network of national organisations, responsible for settling consumers complaints in the area of financial services out-of-court and complying with the principles set out in the [Directive 2013/11/EU on alternative dispute resolution \(ADR\)](#).

Summary of the information with FIN-NET

- For more details, please visit the FIN\_NET website: [https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/retail-financial-services/financial-dispute-resolution-network-fin-net/fin-net-network/about-fin-net\\_en](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/retail-financial-services/financial-dispute-resolution-network-fin-net/fin-net-network/about-fin-net_en)

The FIN-NET form for cross-border complaints are available in the following languages: English, Danish, Dutch, Finnish, French, German, Greek, Italian, Portuguese, Spanish and Swedish, at [https://finance.ec.europa.eu/consumer-finance-and-payments/retail-financial-services/financial-dispute-resolution-network-fin-net/make-complaint-about-financial-service-provider-another-eea-country\\_en](https://finance.ec.europa.eu/consumer-finance-and-payments/retail-financial-services/financial-dispute-resolution-network-fin-net/make-complaint-about-financial-service-provider-another-eea-country_en)

The FIN-NET member will tell you whether they are able to resolve your problem or may refer you to another organisation that can help you. You may be asked for additional information to assess your case properly. Most FIN-NET members can help you free of charge or at a low cost. They usually reach an outcome within 90 days

## 2. Collective redress mechanism

### a. For collective litigation – at EU level

The applicable rules for collective action for litigation at European level are detailed in the Directive (EU) 2020/1828 (dated 25 November 2020).

Please find a short summary of your rights foreseen:

- Domestic or cross border representative actions to defend the collective interests of consumer in cases of mass harm can be taken by non-profit based qualified entities (e.g. consumer organisations or independent public bodies);
- Qualified entities can seek at least 2 types of measures for investor protection: injunctive and redress;
- Penalties under the form of fines, for non-compliance with decisions issued within the representative action will be set out by each Member State;
- Depending on the circumstances of the cases (e.g. interim or definitive measures to stop and prohibit a trader's practice or to eliminate the continuing effects of the infringement), the qualified entities may be able to bring representative actions seeking different types of measures as appropriate.

**b. For collective litigation – at national level**

A collective redress mechanism, as required under Directive (EU) 2020/1828 on representative actions for the protection of the collective interests of consumers, are available at national level for the following countries:

<b>Denmark</b>	Act on access to the initiation of class actions for the protection of consumers collective interests of 18 April 2023  <a href="https://www.ft.dk/ripdf/samling/20222/lovforslag/l21/20222_l21_efter_2behandling.pdf">https://www.ft.dk/ripdf/samling/20222/lovforslag/l21/20222_l21_efter_2behandling.pdf</a>
<b>Finland</b>	Act on Representative Actions for Injunctive Measures (1101/2022) of 20 December 2022  <a href="https://www.finlex.fi/sv/laki/ajantasa/2022/20221101">https://www.finlex.fi/sv/laki/ajantasa/2022/20221101</a>
<b>Greece</b>	Transposition of Directive (EU) 2020/1828 of the European Parliament and of the Council of 25 November 2020 on representative actions for the protection of the collective interests of consumers and repealing Directive 2009/22/EC, strengthening consumer protection, a regulatory framework for ageing wines and other urgent provisions of 14 February 2023  <a href="https://www.hellenicparliament.gr/Nomothetiko-Ergo/Anazitisi-Nomothetikou-Ergou?law_id=425ff379-1bf5-4c80-bb26-af95001ac595">https://www.hellenicparliament.gr/Nomothetiko-Ergo/Anazitisi-Nomothetikou-Ergou?law_id=425ff379-1bf5-4c80-bb26-af95001ac595</a>
<b>Italy</b>	Transposition of Directive (EU) 2020/1828 of the European Parliament and of the Council of 25 November 2020 on representative actions for the protection of the collective interests of consumers and repealing Directive 2009/22/EC of 10 March 2023  <a href="https://www.gazzettaufficiale.it/eli/gu/2023/03/23/70/sg/pdf">https://www.gazzettaufficiale.it/eli/gu/2023/03/23/70/sg/pdf</a>
<b>Netherlands</b>	Act of 2 November 2022 amending Book 3 of the Civil Code and the Code of Civil Procedure in connection with the transposition of Directive (EU) 2020/1828 of the European Parliament and of the

	<p>Council of 25 November 2020 on representative actions for the protection of the collective interests of consumers, and repealing Directive 2009/22/EC (OJ L 2020, 409) (Act implementing Directive on consumer representative actions)</p> <p><a href="https://zoek.officielebekendmakingen.nl/stb-2022-459.pdf">https://zoek.officielebekendmakingen.nl/stb-2022-459.pdf</a></p>
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More information will be provided for the other EU countries when the Directive (EU) 2020/1828 has been implemented.

### **Important Information**

It should be noted that this summary addresses rights conferred on Investors under the applicable legislation governing the operation of the Fund(s) in which you are invested.

The ability to exercise various rights may depend on how you have invested in the Fund(s) and whether you are an Investor on the Fund(s) Investor register or whether you have acquired your interests through an intermediary. This may affect your ability to exercise some of the rights set out above.

You may also be afforded rights under other legislation or regulatory frameworks which are not addressed above.