

## Complaint handling policy

### 1. Purpose

Swiss Rock Asset Management ("SRAM") is an investment management company ("Fund Management Company") under Swiss law. It is also licensed to manage investment portfolios in accordance with mandates given by investors on a discretionary, client-by-client basis.

As such, SRAM is also an alternative investment fund manager under Chapter 2 of the Luxembourg Law of July 12, 2013 on Alternative Investment Fund Managers ("AIFM"). Indirectly, SRAM, in its activity as fund manager of two self-initiated Luxembourg Sicavs, is thus subject to the applicable Luxembourg regulatory provisions regarding "complaints handling policy" that may arise in connection with its activity as fund manager.

The complaint handling procedure is designed to ensure that complaints are handled properly and in a timely manner. SRAM ensures objectivity in the handling of complaints with the goal of finding the truth. Potential conflicts of interest are identified and mitigated in accordance with SRAM's Conflict of Interest Policy.

A grievance is any expression of dissatisfaction by an investor or potential investor. The complaint or grievance may relate to any aspect of service, marketing, administration (initial or ongoing), the sales process, or any other aspect of SRAM where a customer has a grievance.

### 2. How to complain

The complainant must submit a written complaint ("Complaint Letter") with the following information:

- First and last name
- Contact details

The "Letter of Complaint" must describe in detail the complete history and facts from which the complaint arises and must include all necessary supporting documentation. The complainant may submit the complaint in the official language or one of the official languages of his/her Member State.

### 3. To whom a complaint should be addressed

The complainant may address the complaint in the first instance by sending the "letter of complaint" to:

By email

- [info@swiss-rock.ch](mailto:info@swiss-rock.ch)

By letter

- Swiss Rock Asset Management AG, Rigistrasse 60, CH-8006 Zurich, Switzerland.

Rubricated for the attention of the Compliance Department.

This applies to all complaints against Swiss Rock Asset Management as well as to complaints against Swiss Rock Asset Management employees.

### 4. Responsible person

The responsible person in the first instance is the complaint handler ("Complaint Handler") who is responsible for the complaint. If the handling of the complaint in the first instance has not resulted in a satisfactory response for the complainant, the written response from Swiss Rock Asset Management will provide the contact details of the responsible person at management level, which will give the complainant the opportunity to raise the complaint with Swiss Rock Asset Management management.

## **5. Timing of the procedure**

SRAM will acknowledge the complaint in writing or respond to the complainant in writing within 10 business days of receipt of the complaint. In either case, SRAM shall inform the complainant of the name and contact details of the person responsible for the complaint (person responsible for the complaint). SRAM will provide a response to the complainant within one month of receipt of the complaint, if possible. If SRAM considers that this timeframe is exceeded, the complainant will be informed of the reasons for the delay and SRAM will indicate the date on which the file review is expected to be completed.

## **6. Out-of-court settlement of complaints by the CSSF**

If the handling of the complaint at the level of the person responsible for the complaint has not resulted in a satisfactory response for the complainant, SRAM will provide the complainant with a full explanation of its position. SRAM will inform the complainant in paper form (and/or by email) of the existence of the out-of-court complaint resolution procedure with the CSSF (including a copy of CSSF Regulation No. 16-07 or a reference to the CSSF website) and that the complainant may file an application with the CSSF within one year of filing the complaint. In addition, SRAM will confirm the decision to use the out-of-court complaint procedure to settle the dispute.

The contact details of the CSSF and the CSSF Regulation No. 16-07 on the out-of-court settlement of complaints, as well as the form for submitting complaints to the CSSF, can be found on the following pages:

Form for filing complaints with the CSSF:

[http://www.cssf.lu/fileadmin/files/Formulaires/Reclamation\\_111116\\_EN.pdf](http://www.cssf.lu/fileadmin/files/Formulaires/Reclamation_111116_EN.pdf)

CSSF Regulation No. 16-07 on the out-of-court settlement of complaints:

[http://www.cssf.lu/fileadmin/files/Lois\\_reglements/Legislation/RG\\_CSSF/RCSSF\\_No16-07eng.pdf](http://www.cssf.lu/fileadmin/files/Lois_reglements/Legislation/RG_CSSF/RCSSF_No16-07eng.pdf)

CSSF email address: [reclamation@cssf.lu](mailto:reclamation@cssf.lu)

Postal address of the CSSF: Commission de Surveillance du Secteur Financier Département  
Juridique CC  
283, route d'Arlon  
L-2991 Luxembourg  
Fax : (+352) 26 25 1 - 2601

CSSF FAQ:

[http://www.cssf.lu/fileadmin/files/Protection\\_consommateurs/Reclamations/FAQ\\_complaints\\_11112016eng.pdf](http://www.cssf.lu/fileadmin/files/Protection_consommateurs/Reclamations/FAQ_complaints_11112016eng.pdf)

## **7. Disclosure**

Investors can find more details at the following links:

<https://www.swiss-rock.ch/unternehmen/Governance/>

In addition, they can request additional information free of charge by writing to the following address:

**Swiss Rock Asset Management AG**

Rigistrasse 60  
CH-8006 Zurich

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