



Client Complaint Management Procedure

Moventum Asset Management is committed to promptly and thoroughly investigate any dissatisfaction from its Investors. The procedure detailed below allows Moventum Asset Management to investigate any dissatisfaction from its Investor's side in line with the Luxembourg regulatory requirements.

Management oversight of complaints is ensured through regular internal review and reporting.

A complaint can be any written, verbal or electronic communication from a (potential) Investor to express dissatisfaction and can be submitted free of charge.

If the Investor wishes to express his/her dissatisfaction/complaint, he/she should first contact his/her Financial Advisor.

If the Investor remains dissatisfied with the response or has not received an answer within a reasonable timeframe, the Investor should contact Moventum Asset Management directly.

When contacting Moventum Asset Management with a complaint, the following details shall be included:

- Relevant Investor number(s)
- Investor Full name and contact details
- Role on the Investor relationship (e.g. Investor or representative of a Investor, lawyer etc.)
- Information pertaining to the complaint (detailed description of the facts underlying the complaint)
- Relevant document(s) and/or correspondence
- Any other detail(s) of relevance regarding the complaint.

If Moventum Asset Management is not able to provide the Investor with an answer within a short time, an acknowledgement of the Investor's complaint will be issued, by letter or by another durable medium (such as email or fax), within 10 working days from the date of receipt and Moventum Asset Management will inform the Investor of the contact person who will be in charge of the complaint together with an indicative timeline by when a response or resolution will be provided.

Moventum Asset Management is committed to provide the Investor with an answer to his/her complaint within one month of receipt of the complaint, by letter or another durable medium (such as email or fax).

Where an answer cannot be provided within this period, Moventum Asset Management will inform the Investor of the delay and the date at which the answer is likely to be provided.

Should the Investor feel that he/she did not receive a satisfactory answer, the Investor may appeal directly to Moventum Asset Management's Board of Managers, namely to the person in charge of complaints who is registered with the CSSF:

Mr Michael Jensen
Moventum Asset Management S.A.
12 rue Eugène Ruppert • L-2453 Luxembourg
Fax no.: (+352) 26 154 305

Out-of-court resolution of complaints

If, despite Moventum Asset Management's best efforts, the Investor remains dissatisfied with Moventum Asset Management's response or has not received an answer to his/her complaint within the relevant timeframe (as indicated above), the Investor may refer to the Luxembourg financial regulator according to the provisions of the CSSF Regulation N°16-07 and related CSSF Circular 17/671 relating to the out-of-court resolution of complaints.

Commission de Surveillance du Secteur Financier (CSSF)
283, route d'Arlon • L-1150 Luxembourg
Postal Address: L-2991 Luxembourg
reclamation@cssf.lu

In order to submit an out-of-court resolution of complaints to the CSSF, the Investor must fulfil the following conditions:

- The Investor must have sent his/her complaint previously to the Moventum Asset Management person in charge of complaints registered towards the CSSF, and
- The Investor must have received no answer or no satisfactory answer from the Moventum Asset Management person in charge of complaints within the relevant timeframe (as indicated above).
- The Investor may file his/her request with the CSSF within one year after the complaint has been filled with the person in charge of the complaint handling.
- The Investor's complaint must be submitted in accordance with CSSF requirements established on the CSSF Website and the applicable form.
- Once the CSSF has received a request that meets all the conditions, it will transmit a copy thereof to Moventum Asset Management and will ask the Moventum Asset Management person in charge of complaints to take position within a period up to one month from the date at which the file was sent.
- The CSSF will inform the Investor of this transmission.
- Within three weeks after receipt of the complete request, the CSSF will inform the Investor and Moventum Asset Management:
 - if it accepts to treat the request or
 - if it is unable to deal with the request (providing detailed explanation of the reason thereof to the involved parties).
- Once the request analysis has been completed by the CSSF, it will send to the involved parties a conclusion letter with the reasons for the position taken, namely either:
 - a conclusion letter by the CSSF that the request is partly or totally justified:
 - asking the Investor and Moventum Asset Management to contact each other to settle the dispute in view of the reasoned conclusion and to inform the CSSF of the follow up; or
 - a conclusion letter by the CSSF that the positions of the Investor and Moventum Asset Management are irreconcilable or unverifiable.

In any case the conclusion reached by the CSSF after the analysis of the request may be different from the order of a court applying legal provisions.

Therefore, the Investor as well as Moventum Asset Management is free to accept or refuse to follow them as the conclusions by the CSSF are not binding.

The Investor as well as Moventum Asset Management may also seek remedies through legal proceedings; in particular, if the Investor and Moventum Asset Management jointly fail to reach an agreement after the CSSF issued its reasoned conclusion.

Upon proposal of solution by the CSSF, both complainant and Moventum Asset Management will have to inform the CSSF whether each party decides to accept, to refuse or to follow the solution proposed by the CSSF within the timeframe defined by the CSSF in its reasoned conclusion letter.

Closing of procedure by the CSSF

The CSSF will close the procedure if one of the following occurs:

- Above situation;
- The CSSF is informed that an amicable settlement between the involved parties is reached during the procedure;
- In the case of a written withdrawal of one of the involved parties (written notification to the CSSF and the involved party);
- Where the right on which the complaint is based is prescribed and where Moventum Asset Management claims that the time period for exercising that right has expired;
- Where the complaint has been submitted to a Luxembourg or foreign court or arbitrator;
- Where the complaint has been submitted to an out-of-court complaint resolution body other than the CSSF in Luxembourg or abroad;
- Where the complainant does not provide the additional documents, information, explanations or positions requested by the CSSF within the period set by the CSSF which cannot exceed three weeks.