



## Client Complaint Management Procedure

Moventum Asset Management is committed to promptly and to 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 if the investor 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.

Moventum Asset Management commits to confirm the due receipt of the complaint within short notice and to answer on the investor's complaint within one month after having received the full complaint, by letter or by any other durable medium (such as email or fax).

If it is not possible to answer within the initial period, Moventum Asset Management will inform the Investor about the delay, the contact person in charge of the complaint and about an indicative timeline by when a response or resolution will be available.

Should the Investor feel that the investor 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 Sascha Werner  
Moventum Asset Management S.A.  
12 rue Eugène Ruppert • L-2453 Luxembourg

Email: [complaints@moventum-am.lu](mailto:complaints@moventum-am.lu)

## 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

Email: [reclamation@cssf.lu](mailto: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 filed 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 reasoning 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 written conclusion 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.

Conclusions reached by the CSSF after analysis of the request may be different from a court order applying legal provisions. Therefore, the Investor as well as Moventum Asset Management are free to accept or to refuse, 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 had 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 a set period which must not exceed three weeks.