

## Client Complaint Procedure

Moventum is committed to promptly and thoroughly investigate any dissatisfaction from its clients. The procedure detailed below allows Moventum to investigate any dissatisfaction from its client'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) client to express dissatisfaction and can be submitted free of charge. If the client wishes to express his/her dissatisfaction/complaint, he/she should first contact his/her financial advisor. If the client remains dissatisfied with the response or has not received an answer within a reasonable timeframe, the client should contact Moventum directly. When contacting Moventum with a complaint, the following details shall be included:

- Relevant Client Account number(s)
- Client Full name and contact details
- Role on the account (e.g. accountholder or representative of a Client, 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 is not able to provide the client with an answer within a short time, an acknowledgement of the client's complaint will be issued, by letter or by another durable medium (such as email), within 10 working days from the date of receipt and Moventum will inform the client 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 is committed to provide the client with an answer to his/her complaint within one month of receipt of the complaint, by letter or another durable medium (such as email). Where an answer cannot be provided within this period, Moventum will inform the client of the delay and the date at which the answer is likely to be provided.

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

Mr Andrew Walker, Moventum S.C.A.,  
6, rue Eugène Ruppert • L-2453 Luxembourg

### Out-of-court resolution of complaints

If, despite Moventum's best efforts, the client remains dissatisfied with Moventum's response or has not received an answer to his/her complaint within the relevant timeframe (as indicated above), the client may refer to the Luxembourg financial regulator according to the provisions of the CSSF Regulation N°16-07 and related Moventum's Executive Management, namely to the manager in charge of complaints who is registered with the CSSF:

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

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

- The client must have sent his/her complaint previously to the Moventum manager in charge of complaints registered towards the CSSF, and
- The client must have received no answer or no satisfactory answer from the Moventum manager in charge of complaints within the relevant timeframe (as indicated above).

The client may file his/her request with the CSSF within one year after the complaint has been filled with the manager in charge of the complaint handling. The client'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 and will ask the Moventum manager 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 client of this transmission. Within three weeks after receipt of the complete request, the CSSF will inform the client and Moventum:

- 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 client and Moventum 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 client and Moventum 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 client as well as Moventum are free to accept or refuse to follow them as the conclusions by the CSSF are not binding. The client as well as Moventum may also seek remedies through legal proceedings, in particular, if the client and Moventum jointly fail to reach an agreement after the CSSF issued its reasoned conclusion. Upon proposal of solution by the CSSF, both complainant and Moventum 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 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.