

## iM Global Partner Asset Management (« IMGP AM »)

### DETAILS OF THE POLICY ON HANDLING CLIENT COMPLAINTS

1. The purpose of the policy is to ensure that all staff of a iMGP AM entity, including, as appropriate, its branches, are aware of what is required to ensure that any complaint is handled correctly and in accordance with the relevant regulatory requirements.

2. A complaint is any expression of dissatisfaction, whether oral or written, in relation to the provision of a service or failure to provide a service, which is introduced by an eligible complainant in order to recognize a right or redress a prejudice apart from usual business dealings such as contract negotiations.

A request for information, clarification or service is not a complaint.

3. iMGP AM entities implemented said policy to ensure that any complaint is at all times appropriately handled and within a reasonable time, in accordance with the nature of the issue raised, in order to always best serve the complainant's interests. No complaint should remain unanswered.

#### ***Where to send a complaint?***

4. In relation to services provided by iM Global Partner Asset Management (Luxembourg) S.A. as well as in relation to the investment funds "Oyster" and "OYSTER Alternative", including their sub-funds, complaints shall be sent to the attention of the Responsible for Complaints :

iM Global Partner Asset Management S.A.  
54 rue Charles Martel  
L-2134 Luxembourg  
Grand-Duchy of Luxembourg  
complicance@imgp.com

In relation to branches of iM Global Partner Asset Management S.A., the complaint shall be sent to :		
For its Paris branch Att. to : the Branch Manager 8 Place Vendôme 75001 Paris France <a href="mailto:reclamations_france@syzgroup.com">reclamations_france@syzgroup.com</a>	For its Milan branch Att. to : the Branch Manager Via Borgonuovo, 16 I-20121 Milano Italy <a href="mailto:reclami_italia@syzgroup.com">reclami_italia@syzgroup.com</a>	For its Munich Branch Att. to : the Branch Manager Josephspitalstrasse 15, 4th floor D-80331 Munich Germany <a href="mailto:anlegerbeschwerden_deutschland@syzgroup.com">anlegerbeschwerden_deutschland@syzgroup.com</a>

#### ***Content of the complaint***

5. To ease the analysis of the complaint and permit a proper follow up , the complainant is invited to :

- (i) formulate its complaint in a clear language, using preferably an electronic format;
- (ii) specify which service, which investment fund and/or which service provider of a iMGP AM entity is the subject of the complaint;
- (iii) provide evidences and supportive document(s) to the complaint;
- (iv) provide its first and last name, as well as its full residency address and an email.

6. Not providing the above information may generate delay in properly handling and efficiently responding to the complaint.

#### ***Processing the complaint***

7. The receipt of the complaint will be acknowledged within 5 business days of its receipt, if the complaint cannot be resolved before this timeline. Such acknowledgement will include the name and contact details of the person in charge of the complaint and provide a best estimate of the expected timeline to answer the complainant.

8. Complaints shall be answered within 20 business days from their receipt. That being said, should a delay be incurred in the processing of any complaint, the complainant will be informed of that in due time and kept informed on a regular basis on the progress made.

9. The final answer will be sent to the complainant on the outcome of the investigation conducted by the relevant iMGP AM entity and the actions taken to resolve the complaint. The final answer will also indicate:

- (i) in case the final answer is that the complaint is not accepted - the reasons for that conclusion;
- (ii) the name and contact details of the person to whom the complaint can be escalated;

- (iii) options of the complainant, including reference of the complaint to an alternative dispute resolution entity or to take civil actions.

### ***Alternative Dispute Resolution procedure***

10. In relation to services provided by iM Global Partner Asset Management S.A. as well as in relation to the investment funds "Oyster" and "OYSTER Alternative", including their sub-funds, complainants may appeal the national competent authority, the *Commission de Surveillance du Secteur Financier*, to act as Alternative Dispute Resolution Entity.

The complainant may introduce its complaint in Luxembourgish, French, German or English to the *Commission de Surveillance du Secteur Financier* within a year of the initial complaint. Such request can be submitted:

- by email to [reclamation@cssf.lu](mailto:reclamation@cssf.lu) or
- by letter sent to:  
Commission de Surveillance du Secteur Financier  
283 route d'Arlon  
L-1150 Luxembourg, or
- by fax at the following number: +352- 26251601 or
- by filing in the specific and available form at <http://www.cssf.lu/en/consumer/complaints/>

More information on the Alternative Dispute Resolution procedure of the *Commission de Surveillance du Secteur Financier* as well as on the main regulations can be found on the CSSF website under <http://www.cssf.lu/en/consumer/regulation/laws-regulations-and-other-texts/>

11. In relation to services provided by iM Global Partner Asset Management S.A. – Milan Branch, complainants may appeal the national competent authority, the *Arbitro per le Controversie Finanziarie (ACF)*, to act as Alternative Dispute Resolution Entity.

The complainant may introduce its complaint in Italian to the *Arbitro per le Controversie Finanziarie (ACF)* within a year of the initial complaint. Such request shall be submitted online by filing in the specific and available form at <https://www.acf.consob.it/web/guest/ricorso/verifica-requisiti-ricorso>

More information on the Alternative Dispute Resolution procedure of the *Arbitro per le Controversie Finanziarie (ACF)* as well as on the main regulations can be found on the ACF website under <https://www.acf.consob.it/>

12. In relation to services provided by iM Global Partner Asset Management S.A. – Munich Branch, complainants may appeal the national competent authority, the *office of the BaFin arbitration board*, to act as Alternative Dispute Resolution Entity.

The complainant may introduce its complaint in German to the office of the BaFin arbitration board within a year of the initial complaint. Please use the form prepared by the office of the BaFin arbitration board to formulate the complaint (available at [https://www.bafin.de/SharedDocs/Downloads/EN/Formular/dl\\_fo\\_schlichtungsstelle\\_en.html?nn=7858142](https://www.bafin.de/SharedDocs/Downloads/EN/Formular/dl_fo_schlichtungsstelle_en.html?nn=7858142) ).

Together with the required documentation, such complaint (printed and signed) can be submitted

- by email to [schlichtungsstelle@bafin.de](mailto:schlichtungsstelle@bafin.de) or
- by letter sent to:  
Schlichtungsstelle bei der  
Bundesanstalt für Finanzdienstleistungsaufsicht  
Referat ZR 3  
Graurheindorfer Straße 108  
D-53117 Bonn  
Germany, or
- by fax at the following number: +49 (0)228 4108-62299

More information on the Alternative Dispute Resolution procedure of the office of the BaFin arbitration board as well as on the main regulations can be found on its website under [https://www.bafin.de/EN/Verbraucher/BeschwerdenAnsprechpartner/Ansprechpartner/Schlichtungsstelle/schlichtungsstelle\\_node\\_en.html](https://www.bafin.de/EN/Verbraucher/BeschwerdenAnsprechpartner/Ansprechpartner/Schlichtungsstelle/schlichtungsstelle_node_en.html)

13. In relation to services provided by iM Global Partner Asset Management S.A. – Paris Branch, complainants may appeal the national competent authority, the *Médiateur de l'autorité des marchés financiers (AMF)*, to act as Alternative Dispute Resolution Entity.

The complainant may introduce its complaint in French to the *Médiateur de l'autorité des marchés financiers (AMF)* within a year of the initial complaint. Such request can be submitted:

- by letter sent to:  
Médiateur de l'autorité des marchés financiers (AMF)  
17, place de la Bourse,  
75082 Paris Cedex 02, France, or
- by filing in the specific and available form at [https://www.amf-france.org/Formulaires-et-declarations/Contact?lst\\_select\\_form\\_theme\\_id=mediation#](https://www.amf-france.org/Formulaires-et-declarations/Contact?lst_select_form_theme_id=mediation#)



More information on the Alternative Dispute Resolution procedure of the *Médiateur de l'autorité des marchés financiers (AMF)* as well as on the main regulations can be found on the AMF website under <https://www.amf-france.org/Le-mediateur-de-l-AMF/Presentation>