



## Summary of Complaints Handling Policy

### **1. Purpose**

The objective of the policy is to ensure that complaints received by Gamax Management AG (hereinafter “**GMAG**”) in relation to the funds it manages are dealt with professionally, efficiently and consistently, in compliance with applicable legislation and the rules set out by the *Commission de Surveillance du Secteur Financier* (hereinafter “**CSSF**”).

### **2. How to file a complaint**

Complainants shall address a complaint in writing, by post or by fax or by email indicating their name (for legal entities, the name of the legal entity and its legal representatives) together with their contact details. The complainant shall explain in detail the facts originating the complaint, enclosing all relevant supporting documentation. Further details are provided below.

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

Complaints need to be sent in the form of:

- A letter addressed directly to:  
Gamax Management AG  
11/13 Boulevard de la Foire  
L-1528 Luxembourg; or
- An email ([info@gamax.lu](mailto:info@gamax.lu)); or
- A Fax (+352 269 764 54); or
- A message sent through the “Contact us” page of GMAG’s website; or
- Complaints may be forwarded to GMAG by its service providers, distributors or by the CSSF.

Complainants will be able to file their complaints to GMAG in English or German.

#### **b. Content of the complaints**

To ease the analysis and permit a proper follow up, the complainant is invited to provide at least the following information to ensure a prompt handling of the complaint:

- Identity and contact details of the complainant;
- Reason of the complaint (formulate its complaint in a clear language while identifying which service, product or service provider of GMAG is the subject of the complaint);  
and
- Where necessary, copies of any documentation supporting the complaint.

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

### **3. Processing**

For those complaints directly about GMAG, the responsible person at GMAG, checks the facts as appropriate, with the help and co-operation of the other business units if required and drafts a reply on the basis of agreed communication standards. The responsible person shall manage the issue with the complainant thereafter.

The written acknowledgement of receipt will be provided to the complainant within a period which shall not exceed 10 business days after receipt of the complaint, unless the answer itself is provided to the complainant within this period.

GMAG will ensure that each complainant is informed of:

- The measures taken to handle its complaint are properly registered;
- The name and contact details of the person in charge of his/her file;
- The procedure that will be followed to handle the complaint (indicative timetable for handling the complaint, existence of the procedure for out-of-court resolution of complaints before the CSSF, etc.).

A clear, concise and exact response will be sent within 1 month of the receipt of the complaint. If an answer cannot be provided within this time, the responsible person will inform the complainant of the reasons of the delay and indicate the date on which an answer is likely to be achieved.

### **4. Dispute resolution procedure**

Where the complainant did not obtain an answer or a satisfactory answer at the level at which s/he submitted his/her complaint in the first instance, the complainant has the opportunity to escalate the complaint to the level of the management of GMAG. In this respect, GMAG will:

- provide the contact details of the person responsible at this level;
- provide the complainant with a full explanation of GMAG's position as regards to the complaint;
- inform the complainant, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure before the CSSF and send a copy of the CSSF Regulation 16-07 or the reference of the CSSF website;
- indicate to the complainant the different means to contact the CSSF to file a request; and
- inform the complainant, on paper or by way of another durable medium, that s/he can file a request with the CSSF and that, in this case, his/her request with the CSSF must be filed with the CSSF within 1 year after the filing of the initial complaint with GMAG.

Such request must be filed with the CSSF in writing (Luxembourgish, French, German or English) by:

- Email to [reclamation@cssf.lu](mailto:reclamation@cssf.lu); or
- Letter sent to:  
Commission de Surveillance du Secteur Financier  
283, route d'Arlon  
L-1150 Luxembourg; or

- Fax at +352- 26251601; or
- Filing in the specific and available form at <http://www.cssf.lu/en/consumer/complaints/>.

More information on the out-of-court complaint resolution procedure of the CSSF 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/>