



Complaint Handling Policy

IQ EQ Fund Management (Luxembourg) S.A.

Date: 23/07/2026

IQ-EQ Fund Management (Luxembourg) S.A.

A 412F, route d'Esch | L-2086 Luxembourg | T +352 46 61 11 1 | F +352 47 11 01 |
Société Anonyme R.C.S. Luxembourg B 201329 | TVA LU 28213202 |

www.iqeq.com

1. Document Approval

Name	Function	Date
Conducting Officers via Management Committee	COs	16/07/2026
Board members via BoD meeting	IQEQ FM BoD	23/07/2026

2. Scope and applicability

This policy applies to all IQEQ FM staff and must be made available to investors free of charge.

3. Policy Review Cycle

This policy document is to be reviewed on an annual basis from the date of approval and whenever required

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1. Introduction

This Policy sets out the framework adopted by IQEQ FM for the identification, registration, investigation, resolution, monitoring and reporting of complaints.

It has been prepared in accordance with CSSF Regulation 16-07, CSSF Circular 17/671 as amended, CSSF Circular 18/698 Section 5.5.5 on claim and complaint handling and, where relevant, CSSF Circular 19/718 on complaints-handling guidelines for the securities and banking sectors. Where applicable to IQEQ FM's activities, Article 7 of CSSF Regulation 10-04 is also taken into consideration.

The Policy is also aligned with the IQ-EQ Group Client Complaints Policy, which sets minimum Group standards for complaint handling. IQEQ FM applies those Group standards to the extent that they do not conflict with, or fall below, applicable Luxembourg legal and regulatory requirements.

The internal standards of IQEQ Fund Management (Luxembourg) S.A. ("IQEQ FM") foresee that all complaints should be recorded and treated in a careful and prompt manner. Complainants shall be able to file a complaint without charges, and this complaints policy shall be freely made available to them, as mentioned in Article 7 of Regulation 10-4.

The objective of this complaints handling policy is to describe how IQEQ FM wants to:

- Meet the regulatory obligations mentioned above;
- Establish an efficient and transparent framework for handling client complaints to ensure that complaints are treated fairly and promptly;
- Ensure that each complaint and the measures taken for its resolution are recorded and reported to the CSSF;
- Ensure that systematic and recurring problems are identified and rectified; and
- Improve the internal system service delivery functions to clients.

As required by CSSF 16-07 article 16(3) and Section 2 of the Circular 17/671, the Board of Directors ("BoD") of IQEQ FM has appointed a Conducting Officer responsible for complaints handling. The appointment has been duly communicated to the "*Commission de Surveillance du Secteur Financier*" ("CSSF") and IQEQ FM will update the CSSF in the event of any changes to this responsibility.

Note: In case of a common client with other entities of the IQEQ Group this policy will follow in parallel with IQEQ Group's complaint handling procedure, a complaint arriving to other entities of IQEQ Group, that includes a IQEQ FM, will not discharge the application of the process described on this policy.

2. Definition of complaint

A complaint may be made in writing or verbally and may include any expression of dissatisfaction by a client, investor, business partner or authorised representative in relation to:

- a service provided or withheld by IQEQ FM;
- a product managed, administered or otherwise serviced by IQEQ FM; or
- the behaviour or conduct of an employee, delegate, service provider or other person acting on behalf of IQEQ FM.

Formal complaints can be expressed in writing or verbally (by telephone or during a meeting with a client or their representative), in a manner that is open and transparent¹, except in situations where the anonymous external whistleblowing channel has been used. Formal complaints must all be treated equally and seriously. A complaint may not necessarily be founded on valid arguments.

Regardless of the form of the complaint, this procedure applies in the same way to all types of complaints, whether expressed verbally or in writing – excerpt from the CSSF circular: **No complaint should remain unanswered** (CSSF circular 17/671, section 1, paragraph 4).

Verbal complaints: anyone submitting a verbal complaint must be asked to confirm such complaint, where possible, in writing. Where a verbal complaint is not confirmed in writing by the complainant,

IQEQ FM may still register and handle the matter as a complaint where the information received is sufficient to identify the complainant, the subject matter and the

alleged issue. **Whistleblowing channel:** anyone can raise a complaint using the external whistleblowing channel, whose modalities and procedures are set by the “*IQEQ FM – Internal Governance and Whistleblowing Policy*”

In addition, 16-07 defines a complaint as follows: “... *complaint filed with a professional to recognize a right or to redress a harm*¹”.

All IQEQ FM employees are invited to forward any complaints immediately that are brought to their knowledge to the Conducting Officer in charge of complaints handling, as indicated in this procedure (see following sections). Failure to forward a client complaint shall be deemed as professional misconduct.

All IQEQ FM employees must adhere to the Group Code of Conduct in order to ensure a sufficient standard of handling complaints with the client.

3. Responsibilities and registration of complaints

If possible, any employee receiving a complaint should attempt immediately to resolve the issue. If the employee is not able to provide a solution to the satisfaction of the complainant, the complaint shall be forwarded to the relevant department or function.

If the matter cannot be resolved by the relevant department or function and the complainant forwards the claim in written form, the dedicated Conducting Officer (CO) shall be informed as soon as possible to register the complaint.

The employee in charge of complaint handling shall draft a detailed note in the complaints register. The note must include the information set out in the Appendix 1 of this Policy.

The Conducting Officer responsible for complaints handling maintains the Complaints Register, coordinates the investigation of complaints, ensures timely communication with the complainant and arranges internal reporting to the Conducting Officers, the Board and, where applicable, the local Risk and Compliance Committee.

Compliance provides advisory support, monitors adherence to local regulatory requirements and supports the identification of trends, root causes, regulatory breaches, risk events or recurring issues.

The CO will provide a unique complaint reference number, which shall be used at all times for any internal and/or external (written) communication concerning the complaint. In his function as the keeper of the Complaints Register, the CO files the complaint to this register, sets the complaint on an “open” status and will subsequently review and supervise the issue.

Upon receipt of a complaint, the CO shall conduct a thorough investigation and analysis of the relevant facts and circumstances before making a recommendation as to the appropriate recourse, if any. The CO’s recommendation may include a range of responses, such as an apology, provision of a detailed explanation to the complainant, compensatory payments (see topic “*Compensation*” below), and/or remedial action against the concerned employee or department/ function if applicable. This list is not exhaustive and the CO may have other recommended actions to close the complaint.

The CO may also consult other COs whenever he/she deems necessary. If this is still not sufficient to resolve the issue, the use of external parties (lawyers, auditors, etc.) may be sought, but only after having consulted the COs.

If the complaint involves a violation of law, regulations, circulars, the Code of Conduct (CoC) and/ or

¹ CSSF Regulation 16-07, Article 15.

any other internal policy, the CO may treat the matter as a compliance incident, which could entail further investigations.

In case of breach of this Policy or local regulatory/legal requirements, report to the local Board of Directors and the IQEQ FM Risk and Compliance department, within 10 business days.

No complaint or claim should remain unanswered (CSSF circular 17/671, section I, paragraph 4). All IQEQ FM employees are required to forward any complaints or claims immediately that are brought to their knowledge, as indicated in this procedure (see below).

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5. Complaint Resolution Process

a) Confirmation of complaint

Upon receiving a complaint, whether in a written or verbal form, the CO shall prepare and send a letter to the complainant, confirming its receipt, informing the complainant that the matter is under investigation, and providing the complainant with his/her contact information.

IQEQ FM aims to acknowledge receipt of a complaint within 5 business days. In any case, written acknowledgement shall be provided within 10 business days of receipt of the complaint, unless a final response is provided within that period.

The acknowledgement shall include, where appropriate:

- the unique complaint reference number;
- the name and contact details of the person handling the complaint;
- a summary of the complaint;
- confirmation that the matter is under review; and
- a copy of, or link to, the complaints handling procedure.

IQEQ FM_Complaint handling procedure

An answer to the complainant shall be provided within one month of the date of receipt of the complaint and all communication should be made in plain and easily comprehensible language. Where an answer cannot be provided within this period, the CO shall inform the complainant of the causes of the delay and indicate the date at which an answer is likely to be sent.

Any notifications from a government or regulatory body must be immediately reported to the CO, who will immediately deliberate with the COs. The CO shall be the CSSF's sole point of contact for complaints, according to Circular CSSF 17/671, section 2.

b) Investigation, follow-up & response

Complaints shall be investigated promptly, fairly, objectively and consistently. The investigation shall be carried out by, or under the supervision of, the Conducting Officer responsible for complaints handling, with support from employees or functions that are independent from the matter giving rise to the complaint. The Conducting Officer shall have access to all relevant information required to assess the complaint. If the complaint concerns the Conducting Officer responsible for complaints handling, another member of the Management Committee shall oversee the investigation.

Where the investigation cannot be completed within the applicable response timeline, the complainant shall be informed of the reasons for the delay and the expected response date. Complaints which remain unresolved and for which a final response has not been issued within 30 business days shall be escalated in accordance with Appendix 3.

Where appropriate, the complainant may be given an opportunity to comment on IQEQ FM's initial findings or provide additional information before the complaint is closed.

Once the investigation is closed, the CO shall, when possible, immediately provide a response letter or email to the complainant. If this is not possible due to outstanding issues or the need for compensatory payments, the CO shall proceed as described in topic "*Responsibilities in regard to and registration of Complaints*" and/or "*Compensation*" of this Complaints Handling Policy.

In any event, the findings or the result of the investigation the CO shall then update the Complaints Register.

Where appropriate, implementation of new procedures or amendments to existing ones may be considered as remedial measures, to rectify and ensure the issue which triggered the complaint will not occur again.

6. Compensation

If the investigation results in a finding of liability of IQEQ FM and the circumstances require compensation of the complainant, this compensation shall be assessed fairly and in proportion to the nature and seriousness of the complaint. Any compensatory payment, including reimbursement of fees, is subject to the approval of the CO (or, in the event of the CO's absence, any other member of the Management Committee).

All compensatory payments shall be recorded with the Complaints Register. Therefore, the Conducting Officer responsible for handling complaints must be informed accordingly.

7. Closing of Complaints

The answering letter to the complainant shall always be sent via registered mail or e-mail, and shall contain the following statement:

Upon receipt of IQ EQ Fund Management (Luxembourg) S.A.'s final response, should you remain dissatisfied, you may, if so wished, refer the matter to the Luxembourg Regulator, the Commission de Surveillance du Secteur Financier (CSSF) as follows:

- *By mail to:*
Commission de Surveillance du Secteur Financier
Département Juridique CC
283, route d'Arlon
L-2991 Luxembourg
- *By fax using the following number: (+352) 26 25 1-2601;*
- *By e-mail at the following address: reclamation@cssf.lu;*
- *By filling in the online complaint form: <https://reclamations.apps.cssf.lu/index.html?language=en>*

The CSSF circular on the out of court complaint handling can be found on its website, indicated hereunder:

https://www.cssf.lu/wp-content/uploads/cssf17_671eng.pdf

Finally, we would like to thank you for choosing IQ EQ Fund Management (Luxembourg) S.A. for servicing your business"

The letter shall be duly signed by the Conducting Officer responsible for complaints handling and another member of the Management Committee, enabling the complainant to use the out-of-court dispute settlement of CSSF 16-07 as described in topic "CSSF 16-07 – relating out-of-court complaint resolution" below.

There are two possible outcomes upon the complainant's receipt of the answering letter:

- The complainant is satisfied with the IQEQ FM' proposed answer (i.e. the complainant has either confirmed, in writing, his acceptance of the proposal or has failed to reject the proposal in writing within the two-month-response period). Upon the complainant's acceptance of the proposal, either expressly or by default, the CCRO shall inform the CO who will update the Complaints Register and update the status of the complaint to "closed."
- The complainant rejects, in writing, IQEQ FM' proposed answer.
- All complainants should be given an opportunity to respond to our initial response and confirm the accuracy of information collected through the investigation process. The complainant's response should be reviewed to assess if it materially changes our initial response and make corrections where required.

If no new facts are provided by the complainant with his rejection, the complaint will likely escalate to external dispute resolution as described in the topic "External Dispute Resolution" below. The CO, after receiving notice of the rejection, will change the status of the complaint to "on hold."

8. External Dispute Resolution

In cases where IQEQ FM is not able to provide a satisfactory solution to the complainant, the complainant shall be clearly informed that he/she may escalate the issue to the CSSF and address his/her complaint as provided under the following link: <https://www.cssf.lu/en/Document/cssf-regulation-n-16-07> or a court of competent jurisdiction.

9. Out-of-court complaint resolution

In certain circumstances and as defined in the regulation itself, it is possible to seek CSSF's out-of-court complaint resolution. This process is free of charge and still allows the complainant or IQEQ FM to pursue legal action afterwards.

According to Article 15.5 of the Regulation this approach could only be taken, if the issue is forwarded to the CSSF within one year after the complaint has been filed with the professional.

As soon as a letter (or any other form of written communication) from the CSSF, concerning a complaint, is received by IQEQ FM, the CO shall be informed and will proceed according to this Policy.

10. Legal action

In principle, the same action, as described above in topic "CSSF 16-07 – relating out-of-court complaint resolution", shall be taken but it may be that a company lawyer will take over here instead of the CO.

11. External legal advice or assistance

For both of the two previous articles, the person acting for IQEQ FM may seek external legal advice after consultation and approval of the CO.

12. Complaints Register

a) Register keeping

The Complaints Register is maintained by the Conducting Officer responsible for complaints handling. The register shall contain sufficient information to evidence the lifecycle of each complaint, including receipt, acknowledgement, investigation, response, outcome, closure, escalation and any remedial action.

At a minimum, the register shall capture the information listed in Appendix 1. All complaint-related correspondence and supporting documentation shall be retained using the unique complaint reference number and in accordance with applicable retention requirements and the Group Data Retention Policy.

For closed complaints, the retention period shall be 5 years, for complaints with the status "on hold," the retention period shall be 10 years.

b) Monitoring and reporting

The CO will, at least on an annual basis, analyze the register for any patterns in complaints. These patterns may include, but are not limited to:

- numerous complaints regarding a single employee, department or function;
- frequent similar factual issues; and/or
- frequent appearance of the same complainant.

A summary report regarding the handling of complaints must be communicated to the CSSF within five months following the end of the financial year of the AIFM.

This summary report must include a table including the number of complaints registered by the professional, classified by type of complaints, as well as a summary report of the complaints and of the

measures taken to handle them. Therefore, the COs shall receive the Complaints Register and the CO's analysis, at least once a year and must be presented at the Board of the AIFM.

13. Training

IQEQ FM, in addition to the eLearning training periodically provided by Group Risk & Compliance, devotes adequate resources to the awareness and training of all IQEQ FM's employees regarding complaints handling matters.