



EDMOND
DE ROTHSCHILD

COMPLAINTS HANDLING POLICY

EDMOND DE ROTHSCHILD PRIVATE EQUITY LUXEMBOURG S.A.

SEPTEMBER 2024



1.	OBJECTIVE	3
2.	DEFINITION.....	3
3.	POLICY AND PROCEDURES	3
3.1	COMPLAINTS MANAGEMENT POLICY	3
3.2	INTERNAL COMPLAINTS SETTLEMENT PROCEDURES.....	4
3.3	OUT OF COURT RESOLUTION.....	4

1. OBJECTIVE

This document describes the way complaints provided to Edmond de Rothschild Private Equity Luxembourg S.A., (hereinafter “EdR PE Lux”, the “Management Company” or the “AIFM”) are handled. The complaint policy (hereinafter “the Policy”) has been constructed so as to comply with the provisions of the most relevant laws, regulations and circulars applicable in Luxembourg relating to complaints:

- Law of 12 July 2013
- CSSF Circular 18/698 of 23 August 2018
- CSSF Circular 17/671 of 13 October 2017
- CSSF Regulation 16-07 dated 11 November 2016
- CSSF Circular 17/671

2. DEFINITION

Any natural or legal person (hereinafter “the Complainant”) can introduce a complaint to EdR PE Lux in order that their rights or harms may be recognized and redressed.

A complaint is the expression of an objection to something that is unfair, unacceptable or otherwise not up to normal standards. It is a specific request relating to an actual or latent dispute.

Are not considered as admissible requests:

- Complaints that have been previously or are currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad
- Complaints that concern business policies
- Complaints that concern products or services of a non-financial nature
- Complaints that are unreasonable, frivolous or vexatious
- Complaints that have not been previously submitted to EdR PE Lux in accordance with Article 5(1) of the CSSF Regulation 16-07 (related to the out of court procedure)
- Complainants that have not filed a request with the CSSF within one year after s/he filed a request with EdR PE Lux.

3. POLICY AND PROCEDURES

3.1 COMPLAINTS MANAGEMENT POLICY

The AIFM has developed effective and transparent procedures for the prompt and fair handling of complaints, as well as the maintenance of complaints records which shall be made available to the CSSF upon request. This Complaints policy is made available to investors on the web site of the AIFM.

Every written or verbal complaint received directly by the AIFM or indirectly from any service provider from the AIFs and/or their investors is to be communicated to the “**Complaints Handling Manager**” as soon as possible and in any case no later than the eight (8) business days following the receipt of the complaint. The Complaints Handling Manager will have to formally acknowledge receipt of the complaint to the complainant within the ten (10) business days following the receipt of the complaint.

In accordance with article 16(3) of CSSF Regulation and as detailed in section 3 of Circular CSSF 17/671, the Complaints Handling Manager communicates to the CSSF on annual basis (within five months following the end of the financial year of the Management Company) a table including the number of complaints registered by the professional classified by type of complaints.

3.2 INTERNAL COMPLAINTS SETTLEMENT PROCEDURES

Ms. Delphine Gresteau is the Complaints Handling Manager. As such, she is responsible for acknowledging receipt of complaints, or in her absence, a member of the Board of Directors of EdR PE Lux.

Complainants are invited to address their complaints, in writing, by postal mail or e-mail to the attention of:

Delphine Gresteau
Edmond de Rothschild Private Equity Luxembourg S.A.
4, rue Robert Stumper
L-2557 Luxembourg
email address: cbrm@edr.com

Where complaints are expressed verbally during a telephone conversation or a meeting, the Complainant is encouraged to write down the complaint in order to obtain written evidence and to address the complaint to the attention of the Complaints Handling Manager.

Any member of the AIFM receiving any complaint will produce a written report mentioning the following information: (i) his/her name, (ii) the object of the complaints and (iii) the activity(ies) concerned. Such report will be registered in a data base created for such purpose. Then the member will alert the Complaints Handling Manager as soon as possible.

The Complaints Handling Manager will analyze the object of the complaint(s), will decide on the validity of such complaint(s), and will draft another report to be registered in the complaints handling data base, which will include the decision of the validity of the complaint(s), where applicable, the proposed actions for remedy and the person(s) in charge of implementing such remedy.

The Complaints Handling Manager will communicate the decision regarding the validity of the complaint(s) and, where applicable, also the remedy to the relevant person(s) within thirty (30) business days as from the date of the acknowledgement of receipt of the complaint(s) by the AIFM.

3.3 OUT OF COURT RESOLUTION

The Commission de Surveillance du Secteur Financier (hereinafter "CSSF") is the relevant authority for receiving complaints from customers of financial professionals under its supervision and for intervening with these professionals with the aim of settling these complaints amicably.

If within one month after having sent a complaint, in writing to EdR PE Lux, the Complainant has not received an answer or a satisfactory answer, the complaint is considered as admissible by the CSSF and the Complainant can file a request for out-of-court complaint resolution with the CSSF. The complainant may file his/her request with the CSSF within one year after s/he filed his/her complaint with EdR PE Lux. The request shall be filed in Luxembourgish, German, English or French.

Are not considered as admissible requests by the CSSF:

- Complaints that have been previously or are currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad:

- Complaints that concern business policies
- Complaints that concern products or services of a non-financial nature
- Complaints those are unreasonable, frivolous or vexatious
- Complaints that have not been previously submitted to EdR PE Lux in accordance with Article 5(1) of the CSSF Regulation 16-07
- Complainants that have not filed a request with the CSSF within one year after he/she filed a request with EdR PE Lux
- Complaints which request handling would seriously impair the efficient functioning of the CSSF

Details regarding the out-of-court resolution can be found on the CSSF website www.cssf.lu under the section CONSUMER.

Update of the document

March 2015	Initial document	
Mai 2019	Update 18/698	Approved by the conducting officers on the 22 May 2019
June 2021	Name/address of the AIFM	
May 2022	No material change	
May 2023	No material change	