

## Customer Complaints & Investor Rights

At Global Funds Management S.A. ("GFM") we consider that conducting our business in line with the highest level of professional integrity and honesty is crucial. While GFM makes all the possible efforts to conduct its business in a manner that avoids customer complaints, these may occur. Basic professional ethics require that all complaints received by GFM are treated systematically, objectively, fairly and within an appropriate timeframe.

A customer complaint is defined as a written document expressing either dissatisfaction with GFM's general level of service and/or recurring service issue. The complaint must be filed with the GFM in writing, by post, fax or e-mail. The complaint shall be addressed to the Compliance Department (or alternatively to the Client's usual GFM business contacts) at:

Global Funds Management S.A.  
Att.: Compliance Department  
Building A - 33, rue de Gasperich  
L-5826 Hesperange - Luxembourg  
**Fax:** +(352) 273 664 815  
**Email:** [info-GFM@nomura.com](mailto:info-GFM@nomura.com)

GFM commits to acknowledge the receipt of the Customer complaint towards the complainant in writing within ten business days. GFM will also ensure that each complainant is informed of the name and contact details of the person in charge of his/her file. The resolution of the Customer complaint shall not exceed one month from the date of receipt of the complaint unless the plaintiff would be informed in the meantime and in writing of the causes of the delay and the date at which the examination is likely to be achieved.

Contacting the Commission de Surveillance du Secteur Financier ("CSSF")

Prior to submitting a complaint to the CSSF, the Customer is requested to contact GFM first which will deal with the complaint as described above. In case the complainant has not received an answer or a satisfactory answer from GFM within one month, he/she can contact the CSSF which will request the response received from GFM to assess the appropriateness of its eventual further involvement. Where the CSSF is in possession of what it considers to be a complete and admissible file, it will set out a reasoned opinion. The CSSF addresses a conclusion letter to both parties, including the statement of reasons for the position taken. Given that the reasoned conclusions of the CSSF are not binding, the parties are free to accept or refuse to follow them. If one of the parties to a Customer complaint has referred the case to a competent Court, the CSSF will cease its involvement.

### Investor Rights

In line with the Cross-Border Distribution Regulation (EU) 2019/1156 GFM provides a list of investor rights. The below stated list of investor rights shall not be considered as an exhaustive list of all rights that investors may have in respect of a fund. Investors shall refer to the relevant prospectus, offering document, management regulations or articles of incorporation of a fund (as the case may be) for further details in respect of such fund:

- Right to complain;
- Right to receive information and request documents;
- Right with regard to personal data and data privacy;
- Right to redeem; and
- Right to attend and vote at shareholder meetings (if any).

GFM draws the investors' attention to the fact that any investor will only be able to fully exercise his/her/its investor's rights directly against a fund, if the investor is registered himself and in his own name in the register of a fund. In cases where an investor invests in a fund through an intermediary

investing into such fund in his own name but on behalf of the investor, it may not always be possible for the investor to exercise certain rights directly against the fund. Investors are advised to take advice on their rights.

Investors shall not have any direct contractual rights against an investment manager, a depositary, a administrator, a registrar and transfer agent, a corporate agent, a paying agent, a valuation agent, an auditor of a fund or any other service providers of a fund or of GFM who have been appointed from time to time by GFM. In accordance with the 2010 Law and the 2013 Law, liability of the depositary to investors shall be invoked through GFM. Should GFM fail to act despite a written notice to that effect from an investor within a period of three (3) months following receipt of such a notice, that investor may directly invoke the liability of the depositary.