

Complaint Management Procedure

Type: Organizational Directive

No: 0084

Author: H. Jeurink

Current version 1.5

Scope group

<input checked="" type="checkbox"/> FENTHUM group * <input type="checkbox"/> FENTHUM Luxembourg <input type="checkbox"/> FENTHUM Germany
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* Subject to conflicting national provisions

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1 Version information

1.1 Document Owner

Role	Name	From	Until
Chief Compliance Officer	C. Thei	01.12.2018	30.11.2021
Head of Operations	H. Jeurink	01.12.2021	-

1.2 Approval

Version	Department/area	Name	Date	Signature
1.0	Executive Management	See Management resolution	01.12.2018	-
1.1	Compliance	C. Thei	30.04.2020	-
1.2	Compliance	C. Thei	15.11.2021	-
1.3	Management	See circular resolution	18.03.2022	-
	Board of Directors			-
1.4	Management	See circular resolution	31.07.2023	-
	Board of Directors			-
1.5	Management	See circular resolution	05.06.2024	-

1.3 Read confirmation

Department/area	Name	Date	Signature
-	-	-	-

1.4 Validity

Version	Entry into force	Expiry	Comment
1.0	12.2018	29.04.2020	Updates
1.1	30.04.2020	14.11.2021	Updates
1.2	15.11.2021	31.03.2022	Updates
1.3	01.04.2022	31.07.2023	Updates
1.4	01.08.2023	05.06.2024	Updates due to non-regulatory status
1.5.	06.06.2024	-	-

1.5 Document history

Version	Author	Department	Date	Description
1.0	C. Thei	Compliance	12.2018	Initial creation
1.1			30.04.2020	Review & Format
1.2			15.11.2021	Review
	P. Blenz	IT & Organisation	29.11.2021	Layout & format
1.3	H. Jeurink	Management	23.02.2022	Updates
1.4			30.06.2023	Review
1.5			22.04.2024	Updates

This document must be reviewed regularly, but at least once a year.

2 Short description

The complaint management procedure lays down the principles and procedures for registering, processing, and resolving customer complaints of FENTHUM S.à r.l (hereinafter the “Company”).

3 Responsibilities

Management - BDS Controlling: Is responsible for the complaints management

4 Relevant IT systems and interfaces

There are no relevant IT systems or interfaces in use.

5 Content

The complaint management procedure lays down the principles and procedures for registering, processing, and resolving customer complaints. The adequacy and efficiency of the principles stated here, as well as the conformity with legal and regulatory measures, are reviewed regularly by the Company. Any necessary adjustments are undertaken by updating and then publishing this procedure description in writing. **Mr. Harald Jeurink** was appointed as the responsible person for processing complaints.

Your contact: **Mr. Harald Jeurink**
Tel.: 00352 2769 21 1101
E-mail: h.jeurink@fenthum.com

Your complaints are, of course, handled free of charge.

5.1 Definition

A complaint is the reflection of a customer’s dissatisfaction with the Company, with the purpose of:

- Drawing attention to subjective behaviour that is considered damaging
- Achieving compensation for impairment(s) suffered
- Effecting a change to the criticised behaviour

Natural and legal persons, in particular investors, contractual parties, and intermediaries, are deemed customers of the Company. They are complainants.

5.2 Objectives of complaint management

Complaint management is understood as the totality of all the following systematic measures that the Company takes to handle a customer complaint, in order to restore customer satisfaction. The primary objectives of complaint management are:

- Re-establishing or maintaining customer satisfaction
- Minimising the negative implications of customer dissatisfaction on the Company
- Using the reference to operational weakness contained in the complaints
- Avoiding or minimising the resultant costs from troubleshooting

5.3 Complaint management process

Reviewing and resolving the customer enquiry is at the forefront of the complaint procedure. Complaints are handled with the necessary diligence, transparency and objectivity. Processing

a complaint is motivated by objectivity and ascertaining the truth. The customers may address questions, comments and complaints to the Company in writing, by telephone or electronically. All complaints received are collected centrally and processed at the Company. If possible, complaints are resolved within five banking days and the complainant is informed of the outcome. The Company responds to the customer regarding the enquiry or complaint, provided an agreement has not been reached to the contrary on a case-by-case basis. If complexity or other reasons prevent the complaint from being clarified quickly within the five banking days, the customer received an interim report on the processing status. The principles of the complaint management process are published on Company's website (www.fenthum.com).

5.4 Complaints file

A central complaints file is kept at the Company. Once a month, all complaints are recorded in the complaints file by the responsible person, stating the processing status. This complaints file is forwarded to Company's Management once a month.

5.5 Documenting the complaints

The documents for the individual complaints (correspondence, e-mails etc.), together with the information about the processing and settlement, are documented and archived centrally at the Company.

6 Escalation & information procedure

If the described procedure leads to inconsistencies or problems, the following defined escalation chain must be adhered to.

First escalation level	Document Owner
Second escalation level	Head of Department (if different from the first escalation level)
Third escalation level	Management
Fourth escalation level	Board of Directors

In the case of compliance-relevant topics, Legal & Compliance must also be informed immediately.

In the case of complaints/topics related to Ethna Funds, the HESPER FUND SICAV or the MainFirst SICAV, the ETHENEA Independent Investors S.A. - as being the management company - must be informed immediately.

7 Appendix

- none