



Registered office: 3, Boulevard Royal, L-2449 Luxembourg
R.C.S. Luxembourg: B 221 009

Complaints Handling Website Disclaimer

AFFM SA (“**AFFM**” or the “**Company**”) is committed to providing high-quality professional services and maintaining responsiveness to the issues, needs, and concerns of its customers (“**Clients**”). For this purpose, Clients’ complaints are not considered a constraint but rather an opportunity to improve our services.

Definition of a Complaint

Accordingly, AFFM makes every effort to assess any complaints in a fair, consistent, and prompt manner. AFFM handles all complaints with the utmost diligence, transparency and objectivity, and communicates in writing to the Clients, in a plain, easily comprehensible language by a mean of registered communication method, with return receipt.

For the purpose of this Complaints Handling Website Disclaimer, “**Complaint**” shall refer to any expression of dissatisfaction made by any client, person, or organisation (the “**Complainant**”) to the Company or its Branches, related to its services and products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.

Complaints Handling Office

The Compliance Function is entrusted with the receipt and management of Complaints (in such role, the “**Complaints Handling Office**”) under the supervision of the Conducting Officer in charge of complaints handling and compliance (the “**Chief Compliance Officer**”).

How to file a Complaint

Clients wishing to file a formal Complaint may do so in English or in any official language of the Complainant’s home country, either:

By letter, addressed to:

AFFM S.A., Attn. Complaints Handling Office
3, Boulevard Royal L-2449
Luxembourg - Grand Duchy of Luxembourg

By facsimile to:

AFFM Complaints Handling Office
+352 260 967 829.



The Complaints Handling Office is responsible for dealing with Complaints fairly and promptly. If the Complaint is addressed against a member of the Complaints Handling Office, it will be submitted directly to the Chief Compliance Officer (contact details below) or, ultimately, the Senior Management.

When submitting a Complaint, we recommend that you provide **all necessary information**, including:

- Your identity and contact details;
- Details of your relationship with the Company;
- Any facts or behaviors of the Company that led to the Complaint;
- Any further claims, documents, or information that may support the Company's internal review of the case.

For confidentiality purposes, the Company will only consider Complaints from Clients themselves, or from persons who have the Client's express written authorization

Acknowledgment of receipt and response

Within a maximum delay of ten (10) business days after receipt of the Complaint, AFFM (or the Complaints Handling Officer) will send a written acknowledgement of receipt, unless a final answer is provided to the Complainant within this period.

The communication includes the name and contact details of the member of the Complaints Handling Office in charge of the treatment (the "**Compliance Handling Officer**").

The Complaints Handling Officer will gather all relevant data and information from any involved internal department or external third party, analyse the Complaint, and work with these parties to formulate a response in the best interest of the Complainant.

The Company will provide the Complainant with a final response without undue delay and, in any case, no later than thirty (30) days after first receiving the Complaint. If the Company is unable to resolve the matter within that time, it will inform the Complainant of the reasons underlying the delay and indicate the date by which the matter is likely to be achieved.

The Company's final response to the Complainant will include an explanation of its assessment of the Complaint. If remedial action is deemed appropriate in regard to the Complaint, the response will detail how the Company intends to execute the remedies.

Escalation to Senior Management

If the Complainant does not receive an answer or a satisfactory answer from the Complaints Handling Officer, they are entitled to request reconsideration by escalating the Complaint to the



Company's Senior Management, via the CCO. Such a request should be made in writing and sent by mail or fax to:

AFFM S.A., Attn. Chief Compliance Officer

compliance@affm.lu

3, Boulevard Royal

L-2449 Luxembourg

Fax: +352 260 967 829

Out-of-Court resolution with the CSSF

If the complaint handling process described above does not lead to a satisfactory resolution for the Complainant, the Company will provide a full explanation of its position regarding the Complaint and inform the Complainant, in writing or by another durable medium, of the possibility to resort to the out-of-court resolution procedure at the CSSF, in accordance with CSSF Regulation 16-07.

- This procedure is free of charge for the Complainant.
- The CSSF's conclusions are non-binding on either party.
- The Complainant remains free to pursue legal remedies at any time.

If the Complainant chooses to file a request with the CSSF, they must do so within one (1) year after first submitting the Complaint to the Company. Further details (including CSSF contact information) and a copy of CSSF Regulation 16-07, or a link to the CSSF website, will be provided upon request.

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