

Complaints Handling Policy



INTRODUCTION

Japan Fund Management (Luxembourg) S.A. (“JFML”) is a management company authorised under Chapter 15 of the Luxembourg Law of 17 December 2010, as amended, and an alternative investment fund manager authorised under the Luxembourg Law of 12 July 2013, as amended. JFML manages undertakings for collective investment subject to Part I or Part II of the Luxembourg Law of 17 December 2010, specialised investment funds subject to the Luxembourg Law of 13 February 2007, reserved alternative investment funds subject to the Luxembourg Law of 23 July 2016, as well as Irish unit trusts subject to the Irish Unit Trust Act, 1990.

According to the current laws and regulations in force, JFML has established a Complaints Handling Policy and Procedure (the “Policy”) which aims at ensuring that complaints are handled reasonably and promptly pursuant to the legal requirements.

DEFINITIONS AND APPLICABILITY

For the purpose of the Policy a “complaint” is, as defined in the CSSF Regulation 16-07 relating to out-of-court complaint resolution, a complaint filed with a professional to recognise a right or to redress a harm.

Routine queries such as requests for confirmation, explanation or similar matters are not considered as complaints.

COMPLAINTS NOTIFICATION

Complaints may be submitted by either letter, e-mail or fax to the attention of the Complaints Handling Officer by using the following contact details:

Japan Fund Management (Luxembourg) S.A.

To the attention of the Complaints Handling Officer

Address: 1B, rue Gabriel Lippmann, L-5365 Munsbach, Grand Duchy of Luxembourg

Tel: +352 276 920 1

Fax: +352 276 920 440

Online contact form: <https://www.jfml.lu/contact.html#message>

To allow for a prompt and efficient review by the Complaints Handling Officer, the complaint shall contain a clear description of the complaint (including any step, such as a legal proceeding, already taken by the complainant in respect of the complaint) as well as all documents necessary to evidence the identity and capacity of the complainant or its representative.

If such information is not or insufficiently provided at the time of reception of the complaint, the Complaints Handling Officer will request such information, informing the complainant of the relevant provisions of this Policy, and suspend the process of acknowledgment of the complaint pending reception of the minimum information required for a proper handling of the complaint.

RESPONSE TO COMPLAINTS

A written response to any complaint filed with JFML in accordance with this Policy will be communicated to the complainant concerned within 10 business days, unless the answer itself is provided to the complainant within this period, acknowledging receipt of the complaint, advising them of the procedure on complaint handling and setting out the timeframe for a response. The Complaints Handling Officer shall inform the complainant of the follow up of his/her/its complaint.

Once all necessary investigations have been carried out, a response will be communicated to the complainant within one month of receiving the complaint filed in accordance with this Policy detailing any findings in relation to the complaint and any further steps to be taken. Should the Complaints Handling Officer not be in a position to provide an answer within such timeframe, the complainant shall be informed of the causes of the delay and provided with the expected date of completion of the complaint examination.

OUT-OF-COURT COMPLAINT RESOLUTION BODIES

If no response, or an unsatisfactory or negative response, is provided by JFML after a one-month period, JFML shall inform the complainant that he/she/it has the right to file a complaint, depending on the complaint, with the relevant authorities acting as out-of-court complaint resolution bodies:

- The CSSF (Luxembourg): within a period of one year after filing the complaint with JFML. The relevant procedure and regulation may be found on <https://www.cssf.lu/en/customer-complaints>
- The Financial Services and Pensions Ombudsman (Ireland): the relevant procedure and regulation may be found on <https://www.centralbank.ie/contact-us/make-a-complaint> and <https://www.fspo.ie/make-a-complaint>

Any investor may contact JFML in order to obtain additional details on this Policy.