



## **Client complaints handling policy**



Zadig Asset Management S.A. (the “**Firm**”) has set up a complaint handling procedure in order to ensure that complaints received from investors are handled properly and resolved promptly, while always meeting the Clients’ best interests.

The Firm commits to handle a complaint received from a client in accordance with the following principles:

- transparency towards the client;
- no additional fees for the client;
- objectivity;
- efficiency
- timeliness of the answer adapted to the complexity of the complaint.

### **1.1 Definition of a client’s complaint**

A complaint is any expression of dissatisfaction with a product or service provided or offered by the Firm.

### **1.2 Procedure for submission of complaints**

The client may file a complaint in any official language of his country, free of charge, and the communication should clearly indicate that it is a complaint.

A complaint has to be submitted by the client in writing (by mail or email) through any of his usual financial intermediary, which is either:

- the advisor of his bank agency, or
- the distributor, or
- the commercial agent of the asset management company in direct relation with the client.

When contacting the Firm with a complaint, the following details should be included:

- full name of complainant;
- role of complainant;
- contact details;
- detailed description of the facts underlying the complaint;
- relevant document(s) and/or correspondence;
- any other detail(s) of relevance.

The Client can also contact our Firm’s client servicing department either by email ([investor@zadig.lu](mailto:investor@zadig.lu)) or by mail at the following address:



Zadig Asset Management SA  
Service clients  
70C, route d'Arlon  
L-8008 Strassen  
Luxembourg

In the cases where a Client has invested in funds managed by Zadig Asset Management S.A through a nominee<sup>1</sup> and is dissatisfied with the service provided by the latter, the nominee is first responsible for handling the complaint.

If the nominee's response dissatisfies the client, the Firm might be involved, through the intermediary, in the complaint's resolution.

### **1.3 Complaints' resolution process**

The Firm's client servicing department is responsible for complaints handling.

On receipt of a complaint, the Firm's client servicing department sends the client a written acknowledgement, within ten working days, providing early reassurance that it has received the complaint and is dealing with it. The client is also informed of the name and contact details of the person handling the complaint.

Then, the client is informed of any development during the process.

The Firm will provide the client with its answer within maximum one month from the date of receipt of the complaint.

Where the Firm considers that due to the nature of the complaint it shall exceed this period, the client is informed on the reasons of the delay and the date in which the examination is likely to be achieved.

The Firm is given the opportunity to rise in second instance the complaint up to the level of the management by sending a letter to the senior manager responsible for complaint handling.

### **1.4 Out-of-court complaint settlement by the Commission de Surveillance du Secteur Financier (CSSF)**

If, despite the best efforts of the Firm, the complainant remains unsatisfied with the response of the Firm or has not received an answer to the complaint within one month of receipt of the complaint, the complainant may refer to the Luxembourg financial regulator according to the provisions of the CSSF Regulation No. 16-07 relating to the out-of-court resolution of complaints within the year of its formal lodging of a complaint to the level of the management of the Firm in order to obtain an amicable settlement:

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<sup>1</sup> A nominee is a financial intermediary which invests in funds in its own name and on behalf of the Client.



Commission de Surveillance du Secteur Financier (CSSF)

Département Juridique – Service JUR - CC  
283, Route d'Arlon  
L - 1150 Luxembourg  
LUXEMBOURG

E-mail: [reclamation@cssf.lu](mailto:reclamation@cssf.lu)  
Fax: (+352) 26 25 1 – 2601

CSSF website: <http://www.cssf.lu/en/consumer/complaints/> where you may find necessary information on the out-of court complaint resolution procedure before the CSSF.