

## COMPLAINTS' HANDLING POLICY

### 1. Introduction and regulatory framework

Opportunity Financial Services SA is an independent company supervised by the Luxembourg Financial Sector Supervisory Commission (CSSF) as Professionel du Secteur Financier – PSF Spécialisé. The Company provides professional corporate services and fund administration to entities registered in Luxembourg. It has specialised in servicing real estate, private equity and other traditional and alternative investment structures, as well as providing solutions for institutional, corporate, startups and private clients.

Corporate Services Department offers an extensive range of high-quality services among incorporation, accounting, legal & corporate management, independent directors, liquidation, tax compliance, payroll.

Fund Services department provides to AIFs, RAIFFs, SIFs, SICARs... fund administration services like fund implementation, accounting and reporting, Net Asset Value calculation, fund administration, regulatory reporting & compliance, register & transfer agent....

In the framework of these activities, Opportunity Financial Services SA (hereinafter referred as “The Company”) must apply principles for complying with regulatory commitments regarding complaints' handling.

Opportunity Financial Services SA is aware of its responsibilities and therefore it has aligned its complaints' handling policy in accordance with:

- CSSF Regulation N° 16-07 dated 11 November 2016 relating to out-of-court resolution of complaints (the “CSSF Regulation”);
- CSSF Circular 17/671 entered into force on 13 October 2017 clarifying the procedure to be followed and the information to be provided by the person in charge of a financial institution's customer complaints, if a complaint cannot be treated favourably;
- CSSF Circular 18/698 entered into force on 23 August 2018 and its Section 5.5.5.: Claim and complaint handling;
- CSSF Circular 19/718 entered into force on 30 April 2019 related to the adoption of the guidelines on complaints-handling for the securities (ESMA) and banking (EBA) sectors

In accordance with the CSSF Regulation n ° 16-07, a **complaint** is “any complaint filed with a Professional to recognize a right or to redress a harm”. A complaint may be filed with Opportunity Financial Services SA by a client, a person not yet a client or a third party mandated by a client, an investor of a fund for which Opportunity Financial Services is Transfer Agent whether natural person or legal entity.

## **2. Submission of complaints**

A complaint is a written or traceable expression (postal mail, e-mail, chat, recorded phone conversation, ...) of dissatisfaction, justified or not, filed by a client, or an investor in relation to a service or product provided by Opportunity Financial Services SA. In that framework, a request for information, clarification or service ... cannot be considered as a complaint.

The written communication should provide clear details of the issue or matter of concern and include supporting documentation or evidence, where applicable and appropriate. The client or the investor may submit his complaint in French or in English.

Client or investor can file a demand either:

- via e-mail at: [compliance@opportunityfs.com](mailto:compliance@opportunityfs.com)
- or by post to: Opportunity Financial Services SA - 18, rue Robert Stümper L-2557 Luxembourg

The complaint shall be supported by a statement of the reasons on which it is based together with the following documents:

- A detailed and chronological statement of the facts underlying the complaint and the steps already taken;
- In the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that person is legally entitled to act so;
- A copy of a valid ID document of the applicant (natural person) or, where the applicant is a legal person, of the natural person representing this legal person.

## **3. Complaint Settlement Procedure**

As one of our priority is to provide our clients with the highest possible quality of our services and our people's expertise, we take complaints very seriously.

Opportunity Financial Services SA ensures that a thorough and impartial investigation is carried out within a reasonable time frame after receipt of a complaint. To demonstrate our goal, to consistently provide good quality, complaints will always be managed by an Executive Manager – Responsible of Complaints with the help of Compliance Officer.

A representative of Opportunity Financial Services SA will contact the applicant in the following 10 working days and will keep the applicant informed about the progress in handling the claim.

An answer is in any case provided within a period of maximum one month between the date of receipt of the complaints and the date at which the answer was sent. Where an answer cannot be provided within this period, the Company shall inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

In case the issue can be resolved immediately, the written acknowledgement will also include Opportunity Financial Services' proposed response to the complaint and a request for agreement to have the matter settled.

A complaint will always be followed up formally and formal feedback is always given to the client/investor.

The Company is committed to send a final response to all complaints. A written confirmation will be requested before we can consider the complaint as closed.

#### **4. Out-of-Court Resolution**

If the Client or the Investor remains not satisfied with the response provided by Opportunity Financial Services, the Client has the possibility to file a complaint with the CSSF.

The CSSF Regulation 16-07 specifies that this right of appeal is valid for a maximum period of one year from the date the complaint was lodged with the Company. If within one month after having sent a complaint to the professional, the Complainant has not received a satisfactory response or at least an acknowledgement of receipt, the complaint is considered as admissible by the CSSF, the Complainant can file a request for out-of-court complaint resolution with the CSSF.