

	COMPLAINTS HANDLING PROCEDURE	Référence : II-4 Version : V4
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Responsability	
Person in charge of the Policy	Pascale BRADBURY
Department	Compliance and Internal control
Person in charge of the Policy	Pascale BRADBURY

Objective of the Policy
The Objective of this policy is to explain LONVIA CAPITAL's customer complaints processing system.

List of tools/applications used	
Tool(s)	
Application(s)	

List of states used	Archivage (yes/no)	Archive Location

Managing procedure updates				
Version	Date	Status	Author of changes	Nature of the changes
V1	08/04/2020	Completed	AGAMA CONSEIL	Creation
V2	02/06/2020	Completed	J-B BARENTON	Review and insertion of contact data
V3	13/02/2023	Completed	J-B BARENTON	Update on the ESG topic
V4	10/10/2023	Completed	P BRADBURY	Update from person responsible for processing complaints

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Introduction

In accordance with regulations, LONVIA CAPITAL has implemented a complaints processing system specifying:

- The obligation, for LONVIA CAPITAL, to undertake to respond to the complaint of a customer or prospect within a maximum period of two months, except in duly justified special circumstances, and, if the response is not immediately provided, to acknowledge receipt within a maximum of ten working days;
- The establishment of a complaints processing system allowing equal and harmonized treatment;
- The allocation of resources and expertise necessary to ensure this treatment;
- The obligation to monitor complaints in order to identify and remedy malfunctions.

These provisions apply:

- Claims from all unit holders or shareholders when no investment service is provided to them at the time of subscription;
- Complaints from unitholders or shareholders from non-professional clients when an investment service is provided to them by the portfolio management company upon subscription.

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1. SCOPE OF APPLICATION

A. SCOPE

LONVIA CAPITAL establishes and maintains an operational procedure to ensure rapid, efficient and free processing of complaints sent by its clients/holders or prospects as part of its collective management and financial investment advisory activities. These activities are regulated, under the supervision of the Financial Markets Authority (AMF).

B. Définition

By complaint we mean a declaration of the dissatisfaction of a client or prospect with the professional: the latter considers that the service received, provided or advised by LONVIA CAPITAL does not correspond to his expectations or his needs.

A request for information, opinion, clarification, service or benefit is not a complaint.

As such, the following are not considered to be complaints:

- Requests for specific or derogatory marketing information;
- Requests;
- Service requests;
- Suggestions or proposals;
- Requests for information or those linked to a simple misunderstanding.

2. HOW TO SUBMIT A COMPLAINT TO LONVIA CAPITAL

LONVIA CAPITAL has appointed RCCI, Ms. BRADBURY as responsible for processing customer complaints.

Any customer or prospect wishing to send a complaint to LONVIA CAPITAL is invited to send a letter to the following address:

LONVIA CAPITAL
Mrs Pascale BRADBURY, RCCI
9 avenue de l'opéra
75001 Paris

A complaint can also be sent to LONVIA CAPITAL:

- By telephone: 00 33 (0) 6 76 78 22 42
- By e-mail: pascale.bradbury@lonvia.com

Depending on the method of communication used, LONVIA CAPITAL reserves the right to request a complaint letter from its clients/holders so that there is no doubt about the subject or reason for the complaint.

The customer or prospect is then invited to provide their contact details (postal address, email address, telephone number)

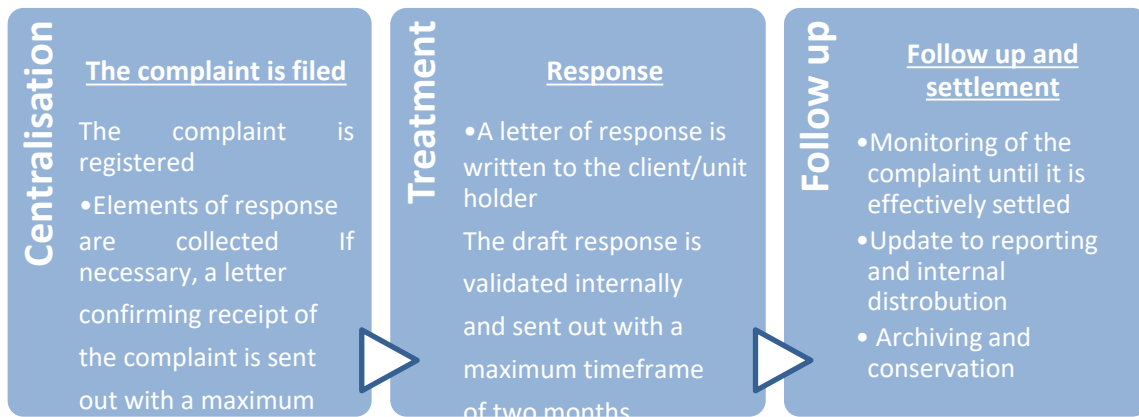
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3. CLAIMS PROCESSING

A. Internal Organisation



▪ Centralisation and processing times

The employee who receives the oral or written complaint from the customer or prospect immediately summarizes it to Ms. BRADBURY.

The effective managers are also systematically kept informed of complaints received.

The RCCI fills in the Complaints Database (Cf. Appendix 1), available on the server and creates a file intended to collect the various elements relating to the complaint.

The RCCI contacts the employee(s) concerned in order to collect the elements necessary for its understanding and the preparation of the response.

If LONVIA CAPITAL does not provide an immediate response to the complaint, a letter acknowledging receipt is sent to the client or carrier within a maximum period of ten working days from receipt of the complaint. The customer or holder is thus informed that his complaint is being processed by LONVIA CAPITAL.

A response to the complaint within this period exempts LONVIA CAPITAL from acknowledging receipt of the complaint.

LONVIA CAPITAL undertakes to respond to any complaint within a maximum of 2 months unless duly justified special circumstances arise.

▪ Complaint processing

The complaint is processed by Ms. BRADBURY, RCCI, in conjunction with the employee(s) concerned. A draft response is thus established.

This response must give the customer or prospect clear and explicit explanations of the subject of their dissatisfaction.

If the incident arises from a fault committed by an external service provider (for example the depositary, custodian, account holder, etc.), a draft letter to the service provider in question is also drawn up.

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After validation by Ms. BRADBURY, RCCI, the letter is then sent to the client or prospect by simple or registered letter with acknowledgment of receipt.

▪ Follow up

Complaints received are monitored by Ms. BRADBURY, RCCI through the Complaints Database. The RCCI and its delegate AGAMA Conseil ensures, within the framework of its controls, that the responses are formulated within the allotted deadlines.

The Complaints Database makes it possible to highlight response times and to know at any time the possible “stock” of complaints, the responses provided, as well as the themes that led to the complaint.

The analysis of the Complaints Database must allow the management company to define and implement corrective measures, in order to improve or correct internal failures highlighted by the complaint.

▪ Case of elements arising from Pillar V of the ISR Label Standard

It is possible to modify the ESG investment strategy or management practices following questions or complaints from investors and distributors.

Furthermore, where applicable, surveys carried out on investors' expectations with regard to ESG management and their satisfaction with the results obtained.

B. Recourse to the AMF Ombudsman

LONVIA CAPITAL does not itself have an internal mediation service.

However, if LONVIA CAPITAL rejects the complaint or refuses to grant it in whole or in part, the response sent to the client informs him of the possibility of contacting the independent AMF Ombudsman:

Autorité des Marchés Financiers
Mrs. Marielle Cohen-Branche
Cedex 02
Fax: 01.53.45.59.60
<http://www.amf-france.org/>

The mediation request form from the AMF as well as the mediation charter are available on the website <https://www.amf-france.org/fr/le-mediateur>

4. INFORMATION TO THE CLIENTS : COMPLAINTS PROCESSING POLICY

LONVIA CAPITAL informs customers of its policy on handling complaints (see Appendix 2), in reception areas where they exist, or on a website.

This covers in particular:

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- Procedures for contacting LONVIA CAPITAL, in particular the contact details of the person in charge of processing complaints;
- Contact details of the competent mediator(s);
- Complaint processing times provided for in the procedure;
- The existence of the mediation charter(s/protocols).

5. USE OF A LAWYER / RECOGNITION OF A PROVISION

When processing a simple response or a more important dispute, LONVIA CAPITAL may resort to the assistance of a lawyer with the prior agreement of the LONVIA CAPITAL Strategic Committee.

The decision to record or not an accounting provision, in relation to the costs incurred by the litigation or the amount of any associated compensation, belongs to the Strategic Committee of LONVIA CAPITAL, based on its assessment of the risk.

6. REGISTRATION OF COMPLAINTS AND MEASURES TAKEN

Documents relating to the complaint must be kept for 5 years from the date of receipt of the complaint. The complaints and responses provided are classified and scanned into the file of the customer concerned.

A double piece of paper is stored in the dedicated binder.

Any other document useful for resolving the problem raised, if applicable, is also placed in the file.

7. MONITORING AND CONTROL

The RCCI monitors the processing of complaints entered in the Complaints Database on an ongoing basis.

The RCCI and its delegate AGAMA Conseil formalize a minimum annual control on the proper application of the rules for processing complaints as set out in this procedure.

Annually the RCCI must communicate to the AMF, within the framework of the FRA/RAC:

- Information on the complaints processing system in place within LONVIA CAPITAL;
- The number of complaints received;
- The amounts of compensation paid over the period following claims.

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ANNEX 1 Complaints Database

Base réclamations NOM DE LASGP															
#	Date de réception de la réclamation *	Modalités de réception de la réclamation (courrier, mail...)	Nom du Client / Partenaire / Tiers à l'origine de la réclamation *	Date du fait générateur de la réclamation	Objet de la réclamation *	Date d'accusé-réception	Contrat, produit ou service visé par la réclamation *	Collaborateur en charge de la réponse	Nom des intervenants autres que le professionnel, le département ou le service visé par la réclamation *	Réponse apportée à la réclamation *	Date de réponse au client *	Dysfonctionnements identifiés*	Action(s) correctrice(s) mené(e)s (création de procédure, renforcement des moyens, nouvelle organisation...)	Impact financier, le cas échéant	Statut de la réclamation (en cours / clôturée)
1															
2															
3															
4															
5															
6															
7															
8															
9															
10															

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ANNEX 2 : POLICY OF COMPLAINTS HANDLING

This information is established in accordance with article 321-40 of the General Regulations of the AMF (Financial Markets Authority), AMF instruction no. 2012-07. It is intended to inform LONVIA CAPITAL customers about the procedure relating to the processing of complaints, applicable from September 1, 2012.

Only declarations of customer dissatisfaction with the professional are concerned, excluding requests for information, opinions, clarification, services or benefits.

Person in charge of processing complaints within LONVIA CAPITAL:

Ms. BRADBURY, RCCI

Possible methods of contacting the person in charge of processing complaints within LONVIA CAPITAL:

By mail: 9 avenue de l'Opéra 75001 Paris

By tel: 00 33 (0) 6 76 78 22 42

By email: pascale.bradbury@lonvia.com

To ensure that their complaint has been received by us, we recommend that the customer sends it to us requesting an acknowledgment of receipt.

Declaration processing times: 10 working days

LONVIA CAPITAL undertakes to send the customer an acknowledgment of receipt within 10 days, in the event that their complaint cannot be processed more quickly. From the date of this acknowledgment of receipt, the request will be processed within a period which may not exceed 2 months.

Appeal :

If you are dissatisfied with the outcome of your complaint, you can appeal to the Mediator of the Financial Markets Authority, by completing the mediation request form. The AMF Ombudsman is also available on the AMF website.

Contact the Mediator by mail:

AMF

Mrs Marielle COHEN-BRANCHE

AMF Mediator

17, place de la bourse 75082 PARIS CEDEX 02

Fax: 01.53.45.59.60

The procedures are confidential, free, contradictory and non-binding. Either party can terminate it whenever it wishes and retains the right to take legal action.

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