

Complaints Handling Policy

History

Version	Release Date	Description	Amended by	Reviewed by	Approval Date
V1	26 April 2018	Complaints handling Policy			

Appendices

Reference	Description	Amended by	Reviewed by	Approval Date
Annex I	Register of Complaints			

1. Glossary

Term	Description
AIF	Alternative Investment Fund (managed by the Company)
FREO Investment Managers S.à r.l.	The Company
Board	Board of Directors of the Company
Conducting Officer	Persons who effectively conduct the business, executive members or members of the governing body of the Company (also known as “Senior Management”)
Complaint	Any written complaint filed with or addressed to the Fund to recognize a right or to redress a harm in the form and procedure as further determined under item 5.1 below. Simple information or explanation requests are not to be regarded as Complaints.

Complainant	Any natural or legal person, such as a customer of the Fund, an investor, former investor, or actively solicited potential investor, having filed a Complaint.
CSSF	Commission de Surveillance du Secteur Financier
The Policy	This Complaints' handling Policy, as amended from time to time

2. Applicable regulations

Luxembourg AIFM Law	Luxembourg AIFM Law of the 12 July 2013 on Alternative Investment Fund Managers
Regulation	CSSF Regulation N° 16-07 relating to the out-of-court complaint resolution repealing CSSF Regulation N° 13-02 of complaints
Circular	CSSF Circular 14/589 re details concerning CSSF Regulation N°13-02 of 15 October 2013 relating to the out-of-court resolution of complaints

3. Scope and purpose

The Policy aims at implementing an appropriate internal structure and defining the internal responsibilities and instructions for the reception and the handling of Complaints, to ensure that they are handled in a manner which is fair, objective and truth oriented. The Policy also aims at enabling the identification and mitigation of any possible conflicts of interests.

4. Complaints handling officer

Erwan Le Berre as a member of the Board of the Fund will be responsible for implementation of the Policy in compliance with the CSSF Regulation and CSSF Circular. He shall also be the point of contact for the CSSF. In compliance with the CSSF Circular, Erwan Le Berre has delegated the day-to-day management of the Complaints procedure to the Manager Corporate Communication of the Management Company (the "**Complaints Handling Officer**").

5. Handling complaints

5.1 Complaint filing

Complaints are expected to be filed in writing to the attention of the Complaints Handling Officer with the reference “Complaint Filing” at the following address or e-mail:

FREO Investment Managers S.à r.l.

Attention: Complaints Handling Officer

EBBC 6D, route de Trèves

2633 Senningerberg

Luxembourg

E-mail address: e.leberre@freogroup.om

Complainants will be able to file Complaints in English as well as in French and German.

The following information shall be provided to ensure a prompt handling of the complaint:

- Identity and contact details of the complainant;
- Reason of the complaint and the resulting alleged damage or loss in relation thereof;
- Where necessary, copies of any documentation supporting the complaint.

5.2 Complaint reception

The Complaints Handling Officer is in charge of the management of Complaints. All Complaints, which are not directly addressed to the Complaints Handling Officer but indirectly addressed through a third-party service provider, should be forwarded to the Complaints Handling Officer without delay.

5.3 Acknowledgement of receipt

The Complaints Handling Officer must send an acknowledgment of receipt in writing within (10) ten business days of receipt of the Complaint, unless the answer itself is provided to the Complainant within this period.

Such acknowledgment of receipt should contain the name and contact details of the person in charge and an indication on when the answer to the complaint can be expected. This time indication shall be within one (1) month after the receipt of the Complaint.

5.4 Registration and information

All Complaints as well as each measure taken to handle it are properly registered by the Complaints Handling Officer in the Complaints Register. The Board member responsible for complaint handling will receive a copy of the registration of a Complaint in the Complaints Register. The Complaints Register is maintained in electronic format in a folder only accessible by the Complaints Handling Officer and the Board.

If the Complaints Handling Officer estimates that a Complaint may have a material impact (financial and or reputational), the Complaints Handling Officer shall without delay inform the Board of the Fund,

which will decide to inform the CSSF, if needed. The answer to the material impact Complaints shall be approved by the Board.

The Complaints Handling Officer shall share the Complaints Register on a quarterly basis with the Board of the Fund, with the mention of problems identified, the corrective measures taken and the follow-up on these measures.

5.5 Assessment

The Complaints Handling Officer shall seek to gather all relevant data and information that is necessary and investigate each Complaint, as soon as it is received.

5.6 Answer to the Complainant

A clear, concise and exact response must be sent within one (1) month of the receipt of the Complaint. If an answer cannot be provided within this time, the Complaints Handling Officer shall inform the Complainant of the reasons of the delay and indicate the date on which an answer is likely to be achieved.

5.7 Escalation of the Complaint

If the Complainant did not obtain an answer or a satisfactory answer from the Complaints Handling Officer, it shall be given the opportunity to raise the Complaint up to Board of the Fund, without prejudice to section 5.8 below. In this respect, the Complaints Handling Officer shall indicate to the Complainant the means to contact the Board of the Fund to escalate its Complaint.

5.8 Existence of the out-of-court complaint resolution at the CSSF

Where the Complaint handling at the level of the Complaints Handling Officer did not result in a satisfactory answer for the Complainant, the Complaints Handling Officer shall:

- Provide the Complainant with a full explanation of its position as regards to the Complaint;
- Inform the Complainant, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure before the CSSF and send a copy of the CSSF Regulation or the reference of the CSSF website;
- Indicate to the Complainant the different means to contact the CSSF to file a request; and
- Inform the Complainant, on paper or by way of another durable medium, that s/he can file a request with the CSSF and that, in this case, his/her request with the CSSF must be filed with the CSSF within one (1) year after the filing of the initial complaint with the Fund.

6. Documentation and Recording of complaints

Complaints shall be documented in a Complaints Register by the Complaints Handling Officer and should include the following information:

- Date of the Complaint;
- Name of the Complainant;
- Type of the Complaint;
- Summary of the Complaint;
- Summary of corrective measure(s) (specifying any compensation);
- Remarks concerning the need to follow up and suggestions, if any, on possible procedural improvements.

Once fully handled, a report and all documents relating to the Complaint shall be registered in the Complaints Register, including all written communication with the Complainant such as, email, fax messages, letters, etc. Notes shall also be made in the Complaints Register regarding date and time for telephone calls with the Complainant regarding the Complaint. All received, handled and closed Complaints shall be electronically archived. The length of time that the matter remains filed shall be based on its nature. However, all Complaints shall remain on file for at least five (5) years. The Complaints file and the register shall be kept at the Management Company premises.

Following Article 16 of the CSSF Regulation and further details provided in the CSSF Circular, Erwan Le Berre shall file on an annual basis before 1 March to the CSSF, covering the previous calendar year, a table including the number of complaints registered, classified by type of complaints, as well as a summary report of the complaints and of the measures taken to handle them.

7. Communication of information to the CSSF

The CSSF may receive complaints from customers or investors of the Fund for intervening with the aim of settling these complaints amicably. The CSSF does, however, not act as an ombudsman in respect of Complaints which are sent directly to them. They will forward the complaint to the Fund.

Should a complaint be forwarded to the Fund by the CSSF, the Complaints Handling Officer will immediately send an acknowledgement letter confirming receipt of the complaint. The complaint will then be dealt with in accordance with the process detailed in this Policy.

In case a complaint has been filed with the CSSF and the supervisory authority has requested the Fund to take position on the facts or opinions presented by the complainant or to provide information or documents, the Fund undertakes to make its best effort to communicate to the CSSF the requested information or documents within the requisite time-period.

Where the CSSF concludes that the complaint is totally or partially justified and asks the Fund and the complainant to settle their dispute, the Fund shall undertake to find with the complainant a common ground to put an end to the complaint.

8. Complaints monitoring

Complaints shall be assessed by the Fund on an-going basis to enable the identification of systemic or recurring problems, as well as any potential legal and operational risks, for example:

- by analysing the causes of the individual Complaints in order to identify the root causes common to certain types of Complaints;
- by considering whether these root causes may also affect other processes or products, including those to which the Complaints do not relate directly; and
- by considering what actions the Fund may need to take to address these root causes.

9. Review of the Policy

The Policy will be reviewed at least once a year in order to assess if it:

- is operating as intended;
- is compliant with regulations and standards applicable to the Company.

Where no update is required, the Policy will be applied consistently over time. Where update is required, the formal approval by the Board will be asked.

