Complaints handling policy

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Santander Asset Management Luxembourg S.A.

Santander Asset Management

Where evolution meets tradition

Table of Contents

1. **Objective** 3
2. Guiding principles of effective complaints handling 4
3. Scope 4
4. Regulatory Background 5
5. Roles and responsibilities 5
6. Process description 6
   - 6.1. RECEIPT OF THE COMPLAINT BY THE AGENT 6
   - 6.2. RECEIPT OF THE COMPLAINT DIRECTLY BY THE MANCO 6
   - 6.3. COMPLAINTS HANDLING AND RECORDKEEPING 6
   - 6.4. COMPLAINTS MONITORING AND REPORTING. 9
   - 6.5. COMMUNICATION AND INFORMATION TO THE CSSF. 10
   - 6.6. COMPANY LIABILITY. 10
7. Change tracking. 11

1. Objective

Santander Asset Management Luxembourg, S.A. (hereafter referred as the "ManCo") seeks to maintain its good reputation and is also committed to maintaining its responsiveness toward its clients and the investors of the funds managed. The purpose of the Complaints Handling Policy is to ensure that complaints are handled in a manner which is fair, objective and truth oriented. It should be noted that Santander Asset Management Luxembourg, S.A. engages in identification and mitigation of any possible conflicts of interests when it comes to complaints handling.

The Complaints Handling Policy (hereafter referred as "the Policy") has been drawn up by the ManCo, to set out the framework for complaint handling (such as, but not limited to, customer and third-party claims) in order to serve the best interest of the staff members and to ensure efficient complaint management within the ManCo. This policy will enable the resolution of any issue received by SAMLUX agents and raised by any complainant.

This Policy aims to describe the main aspects of complaint handling within the ManCo and specify the terms and conditions applicable where the complaints are handled at the level of the ManCo and where the Commission de Surveillance du Secteur Financier (CSSF) is involved in the handling of a request for the out-of-court resolution of a complaint, respectively.

The adoption and regular update of the Policy is crucial for guaranteeing an adequate and timely handling of complaints. Moreover, it allows the ManCo to properly evaluate any potential weak points in its policies, procedures, services and related risks.

For the avoidance of doubts, the terms "complainant" and "complaint" shall be understood as follows:

- "Complainant" refers to any natural or legal person who is presumed to be eligible to have a complaint considered and who has filed a complaint with the ManCo;

- "Complaint" is a statement of dissatisfaction addressed whether oral or written, justified or not, from or on behalf of an eligible Complainant, about the Funds or the Management Company's or its delegates provision of or failure to provide a financial service. A request for information, clarification or service is not a complaint.

It must be noted that simple requests for information or clarifications addressed to the ManCo are not considered as complaints and are therefore out of scope of this Procedure.

Taking into consideration the structure of the Management Company, complaints could come directly to the Management Company or through any of the Agents appointed (Central Administration, Depositary, Distributors and Investment Managers).

2. Guiding principles of effective complaints handling

The Complaints Handling Policy is available on the ManCo website and internally. The Complaints Handling Policy is based on the following principles of which each Service Provider (hereafter referred as "SAMLUX agent") to the Management Company shall be aware of:

- The protection of investors in the Funds managed by the Management Company against any misunderstandings and the warranty towards each investor that its complaints will be adequately treated, answered and followed up.

- Complaints will only be admissible when being addressed in written by the investors of the Funds and in case a financial impact is subject to the complaint. The requests will not be admissible when frivolous or vexatious.

- Agents should be aware of the contents of this policy and must adhere to the rules of this policy when executing their services for the Management Company or the Funds.

- Complaints arisen should be forwarded to the Complaints Handling Officer of the Management Company who will seek for a prompt response in full compliance of the regulations, reflecting the concern the Management Company of objectivity and search for truth.

- As soon as one of the Agents is appointed, it is necessary to be familiar with the specific rules that apply concerning the Complaints Handling Policy of the Management Company.

- The Complaints Handling Officer is in charge of coordinating the handling of investors complaints addressed to the Agents.

- The Management Company will make this policy available to all Agents, which have been appointed by the Management Company. Complaints can be filed in the official language or one of the official languages of the complainant's Member State. The complaint handling is **free of charge.** Each complainant is informed of the name and the contact details of the person in charge of his/her file and therefore may correspond directly with this person. The ManCo endeavors to communicate in a plain and easily comprehensible language.

- The ManCo shall ensure that the processing of personal data complies with the applicable rules on the personal data protection.

3. Scope

This Policy is applicable to all staff members of the ManCo as well as to the Conducting Officers and members of the Board of Directors.

4. Regulatory Background

This Policy has been drafted and implemented to comply with the provisions of the:

- Law of 17 December 2010 relating to undertakings for collective investment,
- CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints (hereafter referred as "CSSF Regulation 16-07"),
- CSSF Circular 17/671 on details concerning CSSF Regulation N°16-07 of 26 October 2016 relating to the out-of-court resolution of complaints (hereafter referred to as "CSSF Circular 17/671") and
- Circular 18/698 Authorisation and organisation of investment fund managers incorporated under Luxembourg law,
- CSSF Circular 19/718 relating to the Adoption of the Guidelines on complaints-handling for the securities (ESMA) and banking (EBA) sectors of 4 October 2018 (JC 2018 35).

In that respect, CSSF Circular 17/671 indicates that "the professionals under the prudential supervision of the CSSF shall have a complaint management policy that is set out in a written document and formalized in an internal complaint settlement procedure. This procedure shall be efficient and transparent, in view of the reasonable and prompt complaint handling. It shall include all aspects of complaint handling within the institution and specify the terms and conditions applicable where the complaints are handled at the level of the professional and where the CSSF is involved in the handling of a request for the out-of-court resolution of a complaint, respectively. [...] Each complaint shall, at all times, be properly handled and within a reasonable time, in view of the nature of the problem raised in the best interest of the complainants. No complaint shall remain unanswered by the professional [...]".

5. Roles and responsibilities

In accordance with the provisions of CSSF Regulation 16-07 and CSSF Circular 17/671, the Executive Committee ("COMEX") is in charge of implementing this Policy and ensure its proper application within the ManCo.

It has entrusted one of its members, the Conducting Officer, with the task of handling, centralization and follow-up of complaints as further detailed below (hereafter referred as "the Complaints Handling Officer"). Conducting Officer in charge of complaints is responsible for informing the relevant staff of the existence of this Policy, including any changes thereto, and remains the sole contact person vis-à-vis the CSSF. Conducting Officer in charge of complaints is furthermore responsible for analysing data relating to complaints handling in order to enable identification and treatment of any recurring or systemic problem, as well as any potential legal and operational risks.

The overall compliance with this Policy is checked on a regular basis by the Compliance and delegated Internal Audit functions of the ManCo.

6. Process description

6.1. Receipt of the Complaint by the Agent

Upon complaint receipt by the affected Agent, the complaint may be solved by the agent directly and inform on a regular basis to the Complaints Handling Officer of the reasons of the complaint and the final solution.

If the origin or the nature of the claim requires support or solution from the Management Company, the Agent must send the claim to the Complaints Handling Officer with applicable accompanying information and/or documents. The forwarding shall be performed by scanned PDF documents.

6.2. Receipt of the Complaint directly by the ManCo

The Clients' complaint shall be addressed to the attention of the Conducting Officer in charge of the complaints, i.e. Complaints Handling Officer (as disclosed in the Key Information Documents):

- By email to:

samluxcomplaints@santanderam.com

- In writing by letter to:

Santander Asset Management Luxembourg S.A.
Compliance Department
43, Av.John F.Kennedy
L-1855 Grand Duchy of Luxembourg

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

- Identity and contact details of the complainant (telephone number, address, e-mail etc)
- Account number(s) involved
- Your role on the account (e.g. account holder or representative of a client, lawyer etc.) Reason of the complaint; and
- Where necessary, copies of any documentation supporting the complaint.

6.3. Complaints handling and recordkeeping

a. Analysis of the Complaint and Response

Complaints Handling Officer gathers and investigates all relevant evidence and information on each received complaint.

The written acknowledgement of receipt is provided to the complainant within a period which shall not exceed 10 business days after receipt of the complaint, unless the answer itself is provided to the complainant within this period.

The acknowledgment of receipt should inform the complainant of:

- the name and contact detail of the person in charge of his/her file; and
- the timescale to respond to the complaint.

Once all necessary investigations have been carried out, the Complaints Handling Officer in charge shall draft an answer to the complainant. The answer shall be written in a plain and easily comprehensible language and should detail any findings in relation to the complaint and any further steps to be taken. The Complaints Handling Officer analyses the data relating to the complaint handling, on a permanent basis, in order to enable the identification and treatment of any recurring or systemic problem, as well as any potential legal and operational risks.

The Manco must provide an answer without undue delay and in any case, within a period which cannot exceed one month after the complaint has been sent by the complainant. Where an answer cannot be provided within this period, the Manco shall inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

Where the complaint handling at the level of the Complaint Handling Officer did not result in a satisfactory answer for the complainant, the Manco shall in writing:

- provide the complainant with a full explanation of his/her position as regards the complaint;
- inform the complainant of the existence of the out-of-court complaint resolution procedure within CSSF aiming at facilitating the resolution of complaints without judicial proceedings;
- inform the complainant that a request to the CSSF must be filed within one year after the filing of the complaint with the ManCo;
- provide the complainant a copy of the CSSF regulation 16-07 relating to the out-of-court resolution complaints or the reference to the CSSF website; and
- indicate to the complainant the different means to contact the CSSF to file a request.

If the case arises, the ManCo confirms the decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute.

b. Existence of the out-of-court complaint resolution at the CSSF

Where a customer did not receive an answer or satisfactory response within one month of a complaint being submitted to the Management Company, the customer can refer their complaint to the CSSF within one year of the date of filing with the Management Company.

In the event of submitting a complaint to the CSSF it should be submitted in the English, Luxembourgish, German, or French languages by the following means:

- either by mail (simple mailing, no registered letter required) to the following address:
  Commission de Surveillance du Secteur Financier
  Département Juridique CC
  283, route d'Arlon
  L-2991 Luxembourg

- By submitting an online complaint form on the CSSF's website:
  https://www.cssf.lu/en/Document/interactive-form-for-complaints/

- or by fax using the following number: (+352) 26 25 1-2601;

- By email to reclamation@cssf.lu

The request 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 by the applicant;

- a copy of the complaint that was sent to the manager responsible for complaint handling;

- a copy of the answer to the prior complaint or the confirmation by the applicant that s/he did not receive an answer one month after s/he sent his/her prior complaint;

- the statement of the applicant that s/he did not refer the matter to a court, an arbitrator or another out-of-court complaint resolution body in Luxembourg or abroad;

- the agreement of the applicant with the request handling conditions of the CSSF as body responsible for the out-of-court resolution of his/her complaint;
- the express authorization of the applicant so that the CSSF can transmit its request (including the attachments) as well as any future correspondence or information to the professional concerned by the request;

- in the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that the 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.

- a copy of the power of representation if the complainant is represented by a third party;

The CSSF acts in its capacity as dispute resolution body. The CSSF's intervention shall be subject to the principles of impartiality, independence, transparency, expertise, effectiveness and fairness. The reasoned conclusions of the CSSF are not binding on the parties. The conclusions of the CSSF may notably be based on legal provisions or on equity considerations.

A request shall not be admissible in the following cases:

- the complaint has been previously or is currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad;

- the complaint concerns the business policy of the professional;

- the complaint concerns a non-financial product or service;

- the request is unreasonable, frivolous or vexatious;

- the complaint has not been previously submitted to the relevant professional in accordance with Article 5(1) of this regulation;

- the complainant has not filed a request with the CSSF within one year after s/he filed a request with the professional;

- the request handling would seriously impair the efficient functioning of the CSSF.

6.4. Complaints monitoring and reporting.

Each complaint received should be recorded promptly in the Complaints Register and send to the CSSF on a yearly basis together with the list of third parties authorized to handle investor's complaints (if any).

The register shall include the number of complaints registered by the Company classified by the type of complaints, as well as a summary report of the complaints and the measures taken to handle them.

Both of the complaints file and the Complaints Register shall be kept at the Company premises for five (5) years after the complaint was dealt in full.

Complaints shall be assessed by the Manco on on-going basis to enable the identification of systemic or recurring problems:

- 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 it may need to take to address these problems.

The yearly communication sent to the CSSF shall include only information related to financial products and/or services.

The synthetic report for the CSSF is also not supposed to be a compilation of summaries on lodged complaints by customers but must present the main problems encountered by the professional and a summary of undertaken measures.

Documents to be provided yearly to the CSSF, within five months following the end of the financial year of the Management Company at the latest.

6.5. Communication and information to the CSSF.

In case a complaint has been filed with the CSSF and the supervisory authority has requested the ManCo to take position on the facts or opinions presented by the complainant or to provide information or documents, the ManCo 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 ManCo and the Complainant to settle their dispute, the ManCo shall undertake to find with the complainant a common ground to put an end to the complaint.

6.6. Company liability.

In case the complaint leads to a liability of the Board of Directors, COMEX and the Complaint Handling Officer will jointly inform the Board of Directors.

The Complaints Handling Officer, senior managers and eventually the Delegated Party (if involved) coordinate the provision of a refund estimation which will be then approved by the Board of Directors.

Once received the estimation calculation, the Board of Directors resolves in relation to the complaint and the conditions of the refund (if any) to the Complainant.

7. Change tracking.

Version	Responsible	description	Approval	Approval date
1	Compliance SAMLUX		BoD	01/07/2011
2	Compliance SAMLUX		BoD	2013
3	Compliance SAMLUX		BoD	2015
4	Compliance SAMLUX	Review regulation	BoD	November 2017
5	Compliance SAMLUX	Review Circular 18/698 and Circular 19/718	BoD	30/06/2020
6	Compliance SAMLUX	Update of the policy	BoD (CR)	April 2023
7	Compliance SAMLUX	Update of the policy	BoD	June 2025

It is made available for investors at the Website of the Management Company:

https://www.santanderassetmanagement.lu

Luxembourg, June 2025.