



NORTHERN TRUST LUXEMBOURG MANAGEMENT COMPANY S.A.

COMPLAINTS HANDLING PROCEDURE

Northern Trust Luxembourg Management Company S.A. (“**NTLMC**”) is a management company established under Chapter 15 of the law of 17 December 2010 relating to undertakings for collective investment and an alternative investment fund manager as per the law of 12 July 2013 on alternative investment fund managers. As such, NTLMC is subject to the prudential supervision of the Luxembourg financial services regulator, the Commission de Surveillance du Secteur Financier (the “**CSSF**”).

The purpose of this document is to provide clear, precise and up-to-date information on NTLMC implemented procedures for managing customer complaints which comply with the requirements of the CSSF Regulation N° 10-04 relating, in particular, to organisational requirements, the CSSF Regulation N° 16-07 relating to out-of-court complaint resolution and Circular CSSF 17/671 specifying certain aspects of this CSSF Regulation and repealing the Circular CSSF 14/589.

These procedures shall equally apply to any customer of NTLMC or any other person or entity receiving services from NTLMC.

1. HOW TO FILE A COMPLAINT WITH NTLMC

The complainant shall address a complaint in writing, by post or by fax or by email indicating their name (for legal entities, the name of the legal entity and its legal representatives) together with their contact details. The complainant shall explain in detail the facts originating the complaint, enclosing all relevant supporting documentation.

Any complaint shall be sent to:

Northern Trust Luxembourg Management Company S.A.
To the attention of the Compliance Officer
6 rue Lou Hemmer
L- 1748 Senningerberg
Grand Duchy of Luxembourg

NTLMC will send to you an acknowledgement letter within 5 business days, indicating the name and contact details of the person in charge of resolving your complaint issue, and the approximate duration of the investigation.

An update letter will be sent to you within 3 weeks following the receipt of the complaint, to inform you of the progress of your complaint.

A final letter will be sent to you to inform you of the outcome of the investigation and the action taken to resolve the complaint, within 6 weeks following the receipt of the complaint



2. CSSF OUT-OF-COURT COMPLAINT RESOLUTION

Where the complaint handling at the level of NTLMC does not result in a satisfactory answer for the complainant, NTLMC informs its customers of the existence of the out-of-court dispute settlement procedure with the CSSF.

Complainants can refer their complaint to the CSSF in French, German, Luxembourgish or English:

- By post at the following address :
CSSF
283, route d' Arlon
L-2991 Luxembourg
Grand Duchy of Luxembourg
- By fax at the following number:
(+352) 26 25 1 - 2601
- By email at the following email address:
reclamation@cssf.lu
- By filing the form available at the CSSF website:
<http://www.cssf.lu/en/consumer/complaints/>