

## **Complaint Handling Policy:**

### **Introduction:**

In accordance with CSSF Circular 17/671 and regulation 16-07, Lux Nordic Wealth Management S.A. (“Lux Nordic” or “the company”) is required to have in operation and ensure compliance with, a written procedure for the effective consideration and proper handling of complaints.

### **Definition:**

A complaint is defined as a verbal or written expression of dissatisfaction by a client or business partner or his/her lawyer. It should be directly addressed to Lux Nordic and should be in relation to:

- A product of or administered by Lux Nordic;
- a service provided by Lux Nordic;
- the behaviour of any employee of Lux Nordic.

**Input:** Written complaint from the client, the Custodian bank or his/their lawyer.

The complaint should be addressed to:

Michelle Præstegaard (compliance officer), [mp@luxnordic.lu](mailto:mp@luxnordic.lu), who will directly communicate to the Managing Director.

As soon as the complaint is identified, the compliance officer:

- adds a reference (i.e. account number) on the letter;
- fills in the Complaint log file;
- files a copy in the file “Complaints” and;
- transmits a copy to the Managing Director and the Account Officer involved.

The compliance office and/or the Managing Director:

- analyses the complaint;
- discusses the issue with the related Account Officer;
- confirms by mail, within 10 business days after reception, to the client/business partner that Lux Nordic has received the complaint;
- requests, if necessary, any complementary information to the relevant source (bank, intermediary, Lux Nordic staff, etc.);
- If letter communication by client’s lawyer or if considered as necessary:
  - transmits the complaint to Lux Nordic’s lawyer;
  - follows the instructions given by the lawyer;
  - files all relevant documentation of the communication with the lawyer.
- handles the complaint;
- prepares a reply to the client;
- has the letter signed by two authorised signatories;
- sends the letter to the client by registered mail;
- writes an internal note, describing the steps and efforts undertaken;
- sends the Compliance Officer a copy of the mail(s), the note and all relevant documentation;
- if the CSSF was also contacted by the client, informs CSSF of the outcome of the complaint;
- stores the documents in the file “Complaints”;

○ updates the Complaints log file.  
The company shall in any case answer the complainant within one month of the date of the receipt of the complaint. Where an answer is not possible within one month of the date of the receipt of the complaint, the company shall inform the complainant of the causes of the delay and indicate the date at which an answer is likely to be achieved.

If the answer received is not satisfactory , you can forward the complaint to the Managing Director:

Jørgen Ganer, [jg@luxnordic.lu](mailto:jg@luxnordic.lu)

After filing the complaint with the Managing Director and if a satisfactory answer is still not received within one month, you can file the complaint with CSSF according to CSSF regulation 16-07. This can be done in writing, by post, fax or e-mail to the CSSF and must be done within one year after the complaint is introduced to Lux Nordic. Please see below the link for the format the complaint should be filed in:

<https://www.cssf.lu/en/Document/>

**Control mechanisms:**

The complaint is handled by two members of staff, including the Managing Director to respect the “four-eyes” principle.

The Internal Auditor ensures procedures have been respected and checks the completeness of the file.

**Output:** Outcome of the complaint

Reporting on a yearly basis to CSSF with number of complaints. Classification by type of claims, and includes a summary report of complaints and action taken to treat them. Template of the reporting is found with CSSF circular 17/671. Should be done before 1<sup>st</sup> of March each year.

**Archives:**

Files are saved on a daily basis under the ad hoc directory.

Hard copies are filed on a continuous basis in the client file.