EDMOND DE ROTHSCHILD

COMPLAINTS MANAGEMENT POLICY

EDMOND DE ROTHSCHILD ASSET MANAGEMENT (LUXEMBOURG)

JULY 2025

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Issue date	28 July 2020
Date of 1st review	28 November 2022
Date of 2nd review	01 July 2025
Implementation date	Immediate
Owner	The Conducting Officer responsible for complaint handling

1. INTRODUCTION AND SCOPE

Edmond de Rothschild Asset Management (Luxembourg) (hereinafter "EdRAM Luxembourg") has a complaints management policy in place, giving all clients, natural persons or legal entities the option to file a complaint.

2. APPROVAL AND ADOPTION

This policy was initially adopted by the Board of Directors on 28 July 2020, updated and adopted by the Board of Directors on 28 November 2022 and on 16 July 2025.

This policy is owned by the conducting officer responsible for complaint handling, who maintains accountability for its content and will arrange periodic reviews and updates on in accordance with EdRAM (Luxembourg) and Edmond de Rothschild (Europe) framework.

3. DEFINITIONS

A complaint is defined as "a grievance submitted to a professional for recognition of a certain right or to redress damage or loss".

The complaint constitutes the expression of dissatisfaction, whether written or received by any traceable means, by a natural or legal person (hereinafter the "Complainant") and which relates to the provision of a service or financial service by EdRAM (Luxembourg).

4. COMPLAINT HANDLING

Any complaints, stating the **Complainant's account number, name and address and the reason for dissatisfaction,** should be sent electronically to the Complainant's usual contact person or by post to the below address:

Edmond de Rothschild Asset Management
The Conducting Officer responsible for complaint handling
4, rue Robert Stumper
L-2557 Luxembourg
Luxembourg

EdRAM (Luxembourg) handles all complaints it receives in accordance with the applicable regulations. To this end EdRAM (Luxembourg) undertakes to:

- Acknowledge receipt within ten days of the complaint being received, unless the response itself is provided to the Complainant within this time;
- Reply to the Complainant within one month of the complaint being received. If a response cannot be provided within this timeframe, EdRAM (Luxembourg) will inform the Complainant of the reasons for the delay and provide a date by which its consideration of the complaint is likely to be completed.

5. « ESCALATION » TO MANAGEMENT

Where a satisfactory response has not been received, the Complainant can contact EdRAM (Luxembourg) Management at the following address:

Edmond de Rothschild Asset Management
For the attention of the Management
4, rue Robert Stumper
L-2557 Luxembourg
Luxembourg

6. EXTRAJUDICIAL PROCEEDINGS BEFORE THE CSSF

If the response provided by the Management of EdRAM (Luxembourg) is considered unsatisfactory by the Complainant, EdRAM (Luxembourg) will inform the Complainant of the existence of an extrajudicial complaints settlement procedure through the CSSF (Commission de Surveillance du Secteur Financier — Luxembourg Financial Sector Supervisory Commission). Complainants may then forward their requests to the CSSF in writing:

- By post to the following address:

  Commission de Surveillance du Secteur Financier
  Département Juridique CC
  283, route d'Arlon
  L-2991 Luxembourg
  Luxembourg

- Or by fax to the CSSF: (+352) 26 25 1-2601
- Or by e-mail to the adress: reclamation@cssf.lu
- Or by using the complaint form available on its website www.cssf.lu https://reclamations.apps.cssf.lu/index.html