

## COMPLAINTS HANDLING POLICY

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Classification	Confidential
Audience	All employees and Management
Ownership	Head of Legal and Compliance

Version	Date	Name	Description
0.01	December 2023	Julie Bourgeois	Initial Document
0.02	December 2024	Julie Bourgeois	Adhoc review
0.03	December 2025	Julie Bourgeois	Adhoc review

#### Document Circulation

This document will be made available on the Company's One Drive for the defined audience as soon as the document will be approved and finalized. Copies are not controlled.

#### Review Cycle

This document shall be reviewed on a yearly basis at least or when required by major changes in the organization (internal governance framework) and operational processes of the Company.

Version	Approval Date by Executive Committee	Approval Date by Board of Managers
<b>0.01</b>	None.	December 2023
<b>0.02</b>	November 27, 2024	December 16, 2024
<b>0.03</b>	November 27, 2025	December 15, 2025

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## 1. BACKGROUND

6 Monks (6M) (the “**Company**”, “**6M**” or “**we**”) is a Luxembourg private limited liability company (*société à responsabilité limitée*), having its registered seat at 1A, Heienhaff, L-1736 Senningerberg, Grand Duchy of Luxembourg, and registered with the Luxembourg Trade and Companies Register under number B 259714.

6M is an authorized alternative investment fund manager (“**AIFM**”) by the Luxembourg *Commission de Surveillance du Secteur Financier* under number A00003285 offering fund management services for alternative investment funds (“**AIF**”).

In accordance with article 15 of the CSSF Regulation 16-07 (the “**Regulation**”), CSSF Circular 18/698 and CSSF Regulation 10-04 the Company has set up this Complaints Handling Policy (the “**Policy**”) with the aim to set out in a written document and formalised an internal complaint resolution procedure to present the approach to be followed by the Company for processing of claims raised by its clients and make sure they are treated in a careful and prompt manner.

The Policy must be approved by the executive committee (the “**Executive Committee**”) and the board of managers (the “**Board of Managers**”), be available to the Company’s employees and published on the Company’s website.

## 2. SCOPE OF THE POLICY

The objective of this Policy is to describe how 6M should:

- deal with client’s issues in a prompt, efficient, appropriate and equitable manner;
- meet the regulatory obligations;
- reflect its concern for objectivity and for ascertaining the truth;
- enable the identification and mitigation of any possible risk;
- ensure that systematic and recurring problems are identified and rectified; and
- improve the internal system service delivery functions to clients.

For the purpose of this Policy, the term **complaint** is defined as an expression of dissatisfaction received whether oral or written, justified or not, from or on behalf of an eligible complainant (client, investor, or business partner), about the Company’s provision of or failure to provide a financial service and addressed directly to the Company or indirectly through a delegated party or by a service provider in relation to:

- a service provided or withheld by 6M;
- a product of or administered by 6M; or
- the behaviour of any employee or person conducting business on behalf of 6M.

A request for information, clarification or service is not a complaint. A complaint is not necessarily founded on valid arguments.

The Regulation defines a complaint as follows: “... Complaint filed with a professional to recognize a right or to redress a harm”. This Policy does not apply where 6M receives a complaint about:

- activities other than those supervised by the CSSF; or
- the activities of another entity for which 6M has no legal or regulatory responsibility (and where those activities form the substance of the complaint).

### 3. DEFINITIONS

<b>Client or Customer</b>	When the term <b>client</b> or <b>customer</b> is used in the Policy it must be referred to the AIF as well as investors investing in any AIF.
<b>Code of Conduct</b>	Means the Code of Conduct set-up by the Company and approved by the Board of Managers.
<b>Complaint Form</b>	Means the form attached in annex 1 of the Policy.
<b>CSSF</b>	Means the Luxembourg <i>Commission de Surveillance du Secteur Financier</i> .
<b>CSSF Circular 18/698</b>	Means the CSSF Circular 18/698 on the authorization and organization of Luxembourgish investment management companies (IFM), including specific provisions on the fight against money laundering and terrorist financing applicable to investment fund managers and entities carrying out the function of registrar agent, was published by the CSSF.
<b>CSSF Regulation 10-04</b>	Means the CSSF regulation n° 10-04 as regards organizational requirements, conflicts of interest, conduct of business, risk management and content of the agreement between a depository and a management company.
<b>Delegated regulation 231/2013</b>	Means the Commission Delegated Regulation (EU) No 231/201 of 19 December 2012 supplementing Directive 2011/61/EU of the European Parliament and of the Council regarding exemptions, general operating conditions, depositaries, leverage, transparency and supervision.
<b>Register</b>	The complaints handling register as further described in section E of the Policy.
<b>the 2010 Law</b>	Means the law of 17 December 2010 on undertaking for collective investment.
<b>the 2013 Law</b>	Means the law of 12 July 2013 on alternative investment fund managers.

**Senior Management**

means the persons who effectively conduct the business of the Company as AIFM within the meaning of Article 102(1)(c) of the 2010 Law and Article 7(1)(c) of the 2013 Law.

#### 4. DELEGATION

A specific mandate for the handling of complaints may be given by the AIFM to a specialized third-party established in Luxembourg or abroad.

In that case, the AIFM must communicate annually to the CSSF a list of third parties authorized to handle complaints. The CSSF must receive this document within five months following the end of the financial year of the AIFM. Further, certain due diligence requirements become applicable as per the Delegation of Functions Policy.

However, 6M has not delegated the handling of complaints to any third party.

#### 5. RESPONSIBILITIES WITH RESPECT TO THE COMPLAINTS TREATMENT

##### 5.1. Person in charge

Complaints can be addressed to the Legal and Compliance Function in a way that enables complaints to be investigated fairly, timely and possible conflicts of interest to be identified and mitigated.

In accordance with section 361 of the CSSF Circular 18/698 and article 15 (3) of the Regulation, the employees in charge of the complaint's handling are as follows:

<b>Person Responsible for complaint handling (PRC)</b>	Christophe Pilz 6 Monks (6M) 1A Heienhaff, L-1736 Senningerberg Grand Duchy of Luxembourg <a href="mailto:Christophe.pilz@6m.lu">Christophe.pilz@6m.lu</a> +352 661 444 105
<b>Person responsible for complaint handling at the level of the Management (MPRC)</b>	Julie Bourgeois 6 Monks (6M) 1A Heienhaff, L-1736 Senningerberg Grand Duchy of Luxembourg <a href="mailto:Julie.bourgeois@6m.lu">Julie.bourgeois@6m.lu</a> +352 661 263 563

The complainant might seek advice and contact the PRC according to the above communication channels.

## 5.2. Role of the PRC and the MPRC

The Board of Managers has appointed Christophe Pilz as PRC.

While the MPRC remains formally responsible for all complaints, the day-to-day tasks involved in receiving, reviewing, monitoring and responding to complaints will be undertaken by the PRC.

All outgoing correspondences concerning complaints shall be signed by the PRC and the MPRC.

MPRC has the full control and oversight over each formal complaint and shall be disclosed to the CSSF.

The MPRC shall be the single point of contact of the CSSF.

The PRC shall ensure that the contact details of the person in charge of the claims must be communicated to the claimant, who will be the person in charge of the complaint handling process.

Any notifications from a government or regulatory body must be immediately reported to the PRC who will immediately discuss the notification with the MPRC.

## 6. COMPLAINTS HANDLING PROCESS

### 6.1. Receipt of the complaint

The answer to the complainant shall be provided within one month of the date of receipt of the complaint. Where it is not reasonably possible (due to ongoing investigation or any other legitimate reason) to provide an answer within this period, the PRC shall inform the complainant of the causes of the delay and indicate the date on which an answer is likely to be provided. Additionally, the confirmation letter shall contain a copy of this Policy.

Any employee of 6M receiving a complaint has the responsibility to attempt immediately to resolve any upcoming issue.

The employee receiving the complaint must notify the PRC about new complaints within one working day, fill in the Complaint Form and file it under the server of the Company.

The Complaint Form shall be completed so that the PRC shall be informed of:

- how and when the complaint was received or identified;
- the details of the complaint;
- any action to be taken or proposed.

## 6.2. Treatment of the complaint

### A. Escalation of the complaint

Upon receipt of the Complaint Form, the PRC shall in its turn:

- Provide a unique complaint reference number which shall be used at all times for any internal and/or external communication;
- File the complaint in the Register (as defined below) setting the complaint on an ongoing status (further guidance is given on the Register in section 4.2 below);
- Provide the complainant with a written acknowledgement of receipt 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. This written acknowledgement of receipt shall contain a copy of this Policy or the link of the Policy on 6M's website; and
- Confirm to the complainant the name and contact details of the PRC.

Upon receipt of a complaint, the PRC shall conduct a thorough investigation and analysis of all the relevant evidence, facts and circumstances before making a recommendation as to the appropriate course of action, if any.

The PRC's recommendation may include a range of responses:

- Apology;
- Provision of a detailed explanation to the complainant;
- Compensatory payments; and/or
- Remedial action against the concerned employee or Function.

The above list is not exhaustive, and the action of the PRC may comprise other things to remedy the issue giving rise to the complaint.

The PRC will present these recommendations to the MPRC, who will approve the appropriate remedy. Where the remedy includes financial compensation, further approval is required from the Board of Managers.

The PRC may also consult the MPRC whenever the complaint requires further investigation or actions, recompense for the client is required, or a similar complaint was received before by a client or the complaint could have a regulatory/legal impact.

To avoid any conflict of interest, any requested logistical support shall be provided by employees who will be not related to or involved in the matter in relation to the complaint.

With respect to the investigation, the PRC shall have unlimited access to all relevant information and documents which could potentially be of interest to resolve the issue.

If the subject of the complaint is the PRC, the MPRC shall take over the role of the PRC.

If the complaint involves a violation of law, regulations, circulars, the Code of Conduct, and/or any other internal policy, the PRC may treat the matter as a compliance incident, which could entail further (internal) investigations.

In case of regulated AIF under management is concerned by the complaint the PRC shall inform the AIF compliance officer.

## B. Follow up and reply

The PRC shall ensure that each complaint as well as each measure taken to handle it are properly registered.

If the complaint involves a violation of laws, regulations, circulars, the Code of Conduct and/or any other policies of the Company, the PRC must treat the complaint as a compliance incident which could entail further internal investigations.

An answer to the complainant should be provided within one (1) month following the date of receipt of the complaint. Should any delay be noted in the treatment of the complaint the Company must inform the complainant about the causes of the delay and indicate when the investigation is likely to be completed. Updates regarding the treatment of the complaint must be provided at least monthly to the complainant.

Any notifications from a government or regulatory body must be immediately reported to the PRC who will deliberate without delay with the MPRC.

When the investigation is closed, the PRC shall, when possible, immediately inform the complainant by written letter. Should any compensatory payments be required, the compensation shall be assessed fairly and in proportion to the nature and seriousness of the complaint.

The findings and results of the investigation must be reported to the PRC to be filed in the Register.

Where appropriate, implementation of new procedures or policies or amendments to existing ones may be considered as remedial measures to rectify and ensure the non-recurrence of the issue which gave rise to the complaint.

## C. Closing of complaints

The answering letter to the complainant shall always be sent via registered mail with confirmation of delivery or by courier and contain a statement to the effect of the following, making the complainant aware of his right to use the out-of-court dispute settlement of the Regulation as described in article 2.5.5 below:

*“We shall assume your acceptance of our proposal if we do not receive a written rejection within two months of the date of this letter.*

*If you find our proposal to be inadequate, we would like to expressly indicate that a non-judicial alternative dispute resolution process is available, where our supervisory authority CSSF (Commission de Surveillance du Secteur Financier) may take the role of the ombudsman. For details, please refer to the regulation CSSF 16-07 which could be found on [www.cssf.lu](http://www.cssf.lu).*

*Please note this opportunity is only available if the filing of a request with the CSSF is done within one year after the initial complaint / claim has been filed”.*

The letter shall be duly signed by the PRC and the MPRC, enabling the complainant to use the out-of-court dispute settlement of the Regulation.

There are two possible outcomes upon the complainant's receipt of the answering letter:

- The complainant is satisfied with the 6M' proposed remedy (i.e. the complainant has either confirmed, in writing, his acceptance of the proposal or has failed to reject the proposal in writing within the two months response period). Upon the complainant's acceptance of the proposal, either expressly or by default, the PRC shall then update the Register and update the status of the complaint to "closed"; or
- The complainant rejects in writing, then 6M' proposes remedy, ensures that there is a thorough explanation of its position on the complainant and sets out the option to maintain the complaint. If no new facts are provided by the complainant with his rejection, the complaint will likely escalate to external dispute resolution. The PRC, after receiving notice of the rejection, will change the status of the complaint to "complaint in treatment."

With respect to closed complaints, the retention period shall be five (5) years whereas with respect to "complaint in treatment" complaints, the status shall be ten (10) years.

#### D. Compensations

If the investigation results in a finding of liability of 6M and the circumstances require compensation of the complainant, this compensation shall be assessed fairly and proportional to the nature and seriousness of the complaint. Any compensatory payment, including reimbursement of fees, is subject to the approval of the Board of Managers.

All compensatory payments shall be noted in the 6M Register. Hence, the PRC must be informed thereof.

#### E. Complaints Register

The Register is kept by the PRC. The Register shall enable the PRC to fulfil its obligations concerning the Regulation's article 16.3, and to monitor and supervise the process set out in this Policy. Therefore, the Register has been designed as a table in excel and contains all necessary and requested specifications as defined in the Regulation and Circular CSSF 17/671.

The Register must be completed throughout the process of a complaint handling as further described all along this Policy.

The Register shall include:

- The name of the client/complainant;
- The date of receipt of the complaint;
- The format of the complaint (e.g. e-mail, letter);
- The name/position of the person within the Company who received the complaint;
- The reason/subject of the complaint;
- The date of response;
- A summary of the response given;
- Details regarding financial impacts (if any);
- The status of the complaint (to be processed, in process, closed).

The PRC shall, at least on an annual basis, analyse the Register for any patterns to identify roots and causes of common types of complaints.

These may include, but is not limited to:

- numerous complaints regarding a single employee, Function;
- frequent similar factual issues; and/or
- frequent appearance of the same complainant;
- the consideration whether such root causes also affect other processes or products;
- the correction, where reasonable to do so, of such root causes.

The Register will contain all information required pursuant to the Regulation and CSSF Circular 18/698.

Therefore, the MPRC shall receive the Register and the PRC's analysis, at least as a draft version, one week before the submission of the Compliance Report which includes the Complaints Report as such term is defined below.

Data mentioned in the Register shall be kept by the Company in accordance with the applicable laws and regulations with respect to the retention rules notably as regards the Regulation (EU) 2016/679 on the protection of natural persons regarding the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC.

## **7. EXTERNAL DISPUTE RESOLUTION**

Should 6M is not able to provide a satisfactory solution to the complainant, the complainant may escalate the issue to the CSSF or a court of competent jurisdiction.

### **7.1. CSSF out-of-court complaint resolution procedure**

By virtue of this Policy which shall be published on 6M's website, 6M informs the complainant of the existence of the out-of-court procedure at the CSSF's level, in accordance with article 15 (5) of the Regulation.

The process is free of charge and still allows the complainant of 6M to pursue legal action afterwards and must be initiated by the complainant in a maximum one-year period following the filing of the complaint.

Where the Company has undertaken to resort to the out-of-court complaint resolution procedure with the CSSF, it shall send a copy of the Regulation or the reference to the CSSF website, as well as the different means to contact the CSSF to file a request, to the complainant, in accordance with article 15 (5) of the Regulation.

### **7.2. Legal action**

In principle, the same action, as described above in article 4.5.1, shall be taken but it may be that a lawyer will take over here instead of the PRC.

## 8. ANNUAL SUMMARY REPORT

An annual summary report of complaints has to be sent by the PRC to the Senior Management and to the Board of Managers (the “**Complaints Report**”).

The Complaints Report must include:

- A list of complaints received during the year;
- The status of complaints received (to be processed, in process, closed)
- Any important information about claims/complaints must be mentioned including the reason behind the complaints and the measures taken in order to treat the complaints.

In accordance with article 16 of the Regulation, the Complaints Report must contain a table including the number of complaints registered by the Company, classified by type of complaints must be communicated to the CSSF no later than five (5) months following the Company’s financial year-end.

In accordance with section 257 of the CSSF Circular 18/698, the Complaints Report might be included in the Compliance Report as further described in the Compliance Charter and the Compliance Policy of the Company.


## 9. POLICY OWNER AND DATE OF IMPLEMENTATION

The Head of Legal and Compliance has been formally appointed as the owner of this Policy. Any amendment to this Policy may be made by the Legal and Compliance Function and Executive Committee and must be duly approved by the Board of Managers of the Company. The Policy must be updated on an annual basis at minimum and ad hoc upon trigger events, such as but not limited to, changes in applicable regulations.

## 10. APPROVAL

This Policy has come into force by approval of the Executive Committee and adoption by the Board of Managers and has no signatures.

**ANNEX 1 – COMPLAINT FORM**

<b>Complaint Form</b> an expression of dissatisfaction received whether oral or written, justified or not must be treated as a complaint. In the event of a complaint received, please complete this form and email it to the relevant stakeholders for escalation. In accordance with the Complaints Holding Policy this Complaint Form must be reviewed by the PRC and the MPRC as applicable.		 <b>6 Monks (6M)</b>	
<b>Date Reported (DD/MM/YYYY)</b>		<b>Issue Date (DD/MM/YYYY)</b>	
<b>Date of acknowledgement (DD/MM/YYYY)</b>		<b>Complaint type</b>	
<b>Complainant Name</b>			
<b>Client name if different</b>		<b>Complainant connection to client</b>	
<b>Fund name</b>			
<b>Summary of the complaint including how and when the complaint was received/identified. Including relevant attachments if any</b>			
<b>Financial impact</b>			
<b>Complaint justified</b>	Y/N (explanations to be added)		
<b>Any action to be taken (or proposed) to avoid future occurrence, including date of implementation/target action completion date and name of action owners</b>			

**ANNEX 2: REGULATORY REFERENCES**

The Company takes the necessary steps to align its Complaints Handling Policy with current best practices and the relevant Luxembourg regulatory framework.

<b>Laws</b>	Law of 10 August 1915 on commercial companies
	Law of 17 December 2010 relating to undertakings for collective investment
	Law of 12 July 2013 on alternative investment fund managers
<b>Code</b>	Criminal Code of the Grand Duchy of Luxembourg
<b>Directives</b>	Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010
<b>Regulations</b>	CSSF Regulation N° 16-07 relating to out-of-court complaint resolution
<b>CSSF circulars</b>	Circular CSSF 17/671 on the specifications regarding CSSF Regulation N° 16-07 of 26 October 2016 relating to out-of-court complaint resolution, as amended by Circular CSSF 18/698
	Circular CSSF 18/698 on the authorisation and organisation of investment fund managers incorporated under Luxembourg law and including specific provisions on the fight against money laundering and terrorist financing applicable to investment fund managers and entities carrying out the activity of registrar agent
	Circular CSSF 19/708 on the electronic transmission of documents to the CSSF