

Swiss Life Fund Management (LUX) S.A.

Complaints Handling Policy

September 2018

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Complaints Handling Policy

1. Purpose

The purpose of this document is to provide clear, comprehensible, precise and up-to-date information on Swiss Life Fund Management (LUX) S.A. complaint handling procedure and on the existence of the out-of-court complaint resolution procedure at the CSSF ("Commission de Surveillance du Secteur Financier) in accordance with CSSF Regulation N°17-671 relating to the out-of-court resolution of complaints. The complaint handling procedure is intended to ensure that complaints are dealt with properly and promptly.

A complaint is deemed to be any expression of dissatisfaction by an investor or potential investor. The complaint or grievance may be in respect of any aspect service, marketing, administration (initial or ongoing), sales process, or any other aspect of Swiss Life Fund Management (LUX) S.A., where a customer has got a grievance.

2. How to complain

The Complainant shall address a complaint in writing ("Complaint Letter") indicating

- First and last name
- Contact details

The "Complaint Letter" shall describe in detail the full case history, the facts from which the complaint originates and shall encompass all necessary supporting documents.

3. To whom a complaint should be addressed

The Complainant may address the complaint in first instance by sending the "Complaint Letter" to:

By E-Mail info@swisslife-fm.com

By Letter **Swiss Life Fund Management (LUX) S.A.**
4a, rue Albert Borschette
L-1246 Luxembourg
Luxembourg

Attention to Compliance Department

4. Responsible Person

The responsible person in the first instance is the "Complaint Handler" in charge of the complaint. If the complaint handling in the first instance did not result in a satisfactory answer for the Complainant, the written answer from Swiss Life Fund Management (LUX) S.A. will mention the contact details of the

person responsible at management level, giving to the Complainant the opportunity to raise the complaint to management of Swiss Life Fund Management (LUX) S.A.

5. Timing of the procedure

Swiss Life Fund Management (LUX) S.A. acknowledges in writing the complaint or answers in writing to the Complainant within 10 (Luxembourg) business days from receipt. In both cases Swiss Life Fund Management (LUX) S.A. will inform the Complainant of the name and contact details of the person in charge of the complaint ("Complaint Handler").

Swiss Life Fund Management (LUX) S.A. provides the Complainant with an answer within one month from the date of receipt of the Complaint. Where Swiss Life Fund Management (LUX) S.A. considers that this time frame will be exceeded, the Complainant will be informed of the causes of the delay and Swiss Life Fund Management (LUX) S.A. will indicate the date on which the file examination is expected to be completed.

6. CSSF out-of-court resolution of complaints

Where the complaint handling at the level of the "Complaint Handler" did not result in a satisfactory answer for the Complainant, Swiss Life Fund Management (LUX) S.A. provides the Complainant with a full explanation of its position. Swiss Life Fund Management (LUX) S.A. will inform the Complainant on paper (and/or by e-mail) of the existence of the out-of-court complaint resolution procedure at the CSSF (incl. either the copy of CSSF Regulation N° 16-07 or the reference to the CSSF website) and that the Complainant can file a request with the CSSF within one year after the complaint rose the Complaint up to the level of the management of Swiss Life Fund Management (LUX) S.A. Additionally, Swiss Life Fund Management (LUX) S.A. will confirm the decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute.

The CSSF contact details and the CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints as well as the complaint filing form of the CSSF can be found on the following sites:

Complaint filing form of the CSSF	http://www.cssf.lu/fileadmin/files/Formulaires/Reclamation_111116_EN.pdf
CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints	http://www.cssf.lu/fileadmin/files/Lois_reglements/Legislation/RG_CSSF/RCSSF_No16-07eng.pdf
CSSF E-Mail address	reclamation@cssf.lu
CSSF postal address	Commission de Surveillance du Secteur Financier Département Juridique II 110, route d'Arlon L-1150 Luxembourg

Fax : (+352) 26 25 1 - 2601

CSSF FAQ

http://www.cssf.lu/fileadmin/files/Protection_consommateurs/Reclamations/FAQ_reclamations_11112016_FR.pdf

The future starts

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