

33 PROCEDURES FOR PROCESSING OF COMPLAINTS

33.1 To whom the procedure applies

This guideline describes the procedures for processing of complaints from non-professional clients in the legal entity Swiss Life Asset Managers Transactions (“SLAM Transactions AS”).

33.2 Procedures upon receiving complaints

Upon receiving complaints per e-mail or written, these shall immediately be submitted to Head of Compliance for further follow-up. In the case of complaints through conversation, the employee receiving the complaint is obligated to clarify whether the client desires to submit a formal complaint. Furthermore, if the client requires assistance in formulating the formal complaint, the appropriate employee at SLAM Transactions AS shall provide the necessary assistance.

Received complaints must be registered in a designated registry that contains the following information;

- The date the complaint was received
- Client identity
- A brief description of the complaint’s content
- Date of reply

When registering a complaint an appropriate format, such as Excel, is required.

If the complaint is solved or for example being solved by external assistance, this shall be noted in the registry.

The client shall receive a confirmation that the complaint has been received and is being processed, no later than a week after submission of the complaint. Furthermore, without undue delay the complaint is to be processed.

Employee and client communication throughout the process is required to be formatted so that it cannot be manipulated by the client, such as pdf.

All documentation regarding the complaint must be archived for at least 5 years after the complaint has been processed.

All documentation regarding the complaint shall be filed.

33.3 Assessment of received complaints

Head of Compliance shall present the complaint for the employee associated with the complaint and make sure the employee has the opportunity to comment on the complaint.

Based on the information that appears, the Head of Compliance must consider:

- If the content of the complaint indicates the requirement of external support

- If the content of the complaint entails that new internal procedures are to be established, further employee training or other administrative measures
- If the complaint contains information that may have legal consequences

The complaint must be processed in a manner that gives foundation for maintaining the client relationship.

Head of Compliance is responsible for formulating a reply to the client. However, if the client is consistent in his/her complaint, the chief executive officer shall be informed.

If the complaint concerns matters that are of significant for the company's future operation or licenses, the reply must be formulated in consultation with the CEO. Furthermore, the CEO shall evaluate if it is necessary to inform the Board of directors of the situation.

If the complaint is being managed by an attorney, the Board of directors are to be informed and all of the communication with the client must go through an attorney.

33.4 Reporting to the Board of directors

The Board of directors are entitled to an orientation regarding complaints and processing at each board meeting and in the quarterly compliance reports.

33.5 Validity of the procedure

This procedure is valid from 1st December 2021

This is a translation of the Norwegian version of the procedure. In case of any discrepancies between the two or misunderstandings of interpretation or translation, the Norwegian version prevails.