



# Lombard Odier Funds (Europe) S.A.

## Complaints Handling Policy

### Clients Complaints

September 2021

Complaints must be submitted in writing to:

By Post	Lombard Odier Funds (Europe) S.A. The Complaint Handling Officer Hema R. Jewootah 291, route d' Arlon L- 1150 Luxembourg Grand-Duché de Luxembourg
By phone	T. +352 27781016
By email	h.jewootah@lombardodier.com

Complaints may also be sent to Lombard Odier Funds (Europe) S.A. through the distributors or paying agents or transfer agents of the funds.

Complainants may file their complaint in the official language(s) recognised in Luxembourg or of their country of residence.

The complaint shall be supported by a statement of the reasons on which it is based together with, inter alia, the following documents:

- a detailed and chronological statement of the facts underlying the complaint and the steps already taken by the applicant;
- in the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that the person is legally entitled to act so;
- a copy of a valid ID document of the applicant (natural person) or, where the applicant is a legal person, of the natural person representing this legal person.

The written acknowledgement of receipt will be provided to the complainant 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.

On a receipt of a complaint, the Complaint Handling Officer shall:

- Investigate the complaint competently, diligently and impartially, obtaining additional information as necessary;
- Assess fairly, consistently and promptly the subject matter of the complaint;
- Assess whether the complaint should be upheld;
- Determine what remedial action or redress (or both) may be appropriate; and if appropriate, whether Lombard Odier Funds (Europe) S.A. has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint; and
- Comply promptly with any offer of remedial action or redress accepted by the complainant.

INTERNAL

The Complaints Handling Officer is entrusted with the management of all complaints to ensure a thorough examination of the issues involved.

Lombard Odier Funds (Europe) S.A. will handle all complaints with the utmost diligence, transparency and objectivity and will communicate its decision to the complainant in writing within 30 calendar days of receipt of the complaint by registered mail with return receipt.

Where the Complaints Handling Officer considers that this timeframe will be exceeded, the complainant will be informed of the causes of the delay and of the date on which the file examination is expected to be completed.

All relevant data is logged in the complaint Register.

In the absence of a response sent to the complainant within the set terms, or if the complainant is not satisfied with the resolution of the complaint, before resorting to a court the complainant may submit to the CSSF within one year after having filed the complaint with the Complaints Handling Officer, in accordance with the CSSF Regulation No 16-07 relating to out-of-court complaint resolution.

The information concerning the procedure for handling complaints is available to investors free of charge.

The contact details of the CSSF and the CSSF Regulation No 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](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](http://www.cssf.lu/fileadmin/files/Lois_reglements/Legislation/RG_CSSF/RCSSF_No16-07eng.pdf)
- CSSF E-Mail address:  
[reclamation@cssf.lu](mailto:reclamation@cssf.lu)  
CSSF postal address:  
Commission de Surveillance du Secteur Financier  
Département Juridique CC  
283, route d' Arlon  
L-2991 Luxembourg  
Fax: (+352) 26 25 1 - 2601
- CSSF FAQ:  
[https://www.cssf.lu/wp-content/uploads/FAQ\\_complaints\\_11112016eng.pdf](https://www.cssf.lu/wp-content/uploads/FAQ_complaints_11112016eng.pdf)

The rights and guarantees stipulated under the “Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data” issued by the European Parliament and the Council (Regulation (EU) 2016/679) regarding the protection of individuals and the handling of personal information are recognized.