

# Complaints Handling Policy

Updated as of February 2021

## I. Introduction

Waystone Management Company (Lux) S.A. (hereafter “**Waystone**”, formerly known as MDO Management Company) is a management company (hereafter “**ManCo**”) pursuant to Chapter 15 of the Law dated 17 December 2010 relating to undertakings for collective investments and is also an alternative investment fund manager (hereafter “**AIFM**”) pursuant to Chapter 2 of the Law dated 12 July 2013 relating to AIFMs.

Waystone has adopted this complaints handling policy (the “**Complaints Handling Policy**” or the “**Policy**”) in the context of managing undertakings for collective investment in transferable securities (“UCITS”) and alternative investment funds (“**AIFs**”), based either in Luxembourg or Ireland, altogether hereafter referred to as collective investment schemes (“**CIS**”) in accordance with the following Laws, Circulars and Regulations:

- CSSF Regulation 16-07 relating to the out-of-court resolution of complaints,
- CSSF Regulation 10-04
- CSSF Circular 17/671
- CSSF Circular 18/698
- The Law of 10 December 2010 relating to undertakings for collective investment
- Similar laws and regulations as applicable to CIS located in Ireland (including, but not limited to, the Central Bank of Ireland’s Consumer Protection Code, as amended from time to time)

## II. Scope

The purpose of this Policy is to establish an efficient and transparent framework for handling client complaints to ensure that complaints are handled fairly and promptly. It shall also apply, to the extent necessary and on basis of the proportionality principle, to other Luxembourg-based entities belonging to the same group as Waystone, and apply as the case may be to other entities located elsewhere than Luxembourg, in particular CIS located in such jurisdictions and on behalf of which cross-border management company and alternative investment fund manager activities are performed by Waystone.

## III. Definition

For the purpose of this Policy, a complaint is defined in the CSSF Regulation 16-07 as “any claim filed with a professional to recognise a right or to redress a harm”. Pursuant to the Central Bank of Ireland’s Consumer Protection Code, a complaint consists in the “expression of grievance or dissatisfaction by a consumer, either orally or in writing, in connection with the provision or the offer of the provision of a product or service to a consumer by a regulated entity”. Accordingly, dissatisfaction expressed by another service provider of the financial sector with whom Waystone has entered into a business relationship shall not qualify as a complaint for the purpose of this Policy.

#### IV. Complaints notification procedure

Waystone is committed to providing a high quality service to all its clients and to treat its clients fairly. To resolve complaints in an effective and transparent manner, complaints shall be notified in writing to Waystone's Complaints Handling Officer. Complaints can either be submitted, free of charge, by letter or by e-mail to the following address:

Waystone Management Company (Lux) S.A.  
To the attention of the Complaints Handling Officer  
19, rue de Bitbourg  
L - 1273 Luxembourg  
Email: [complaints@mco-manco.com](mailto:complaints@mco-manco.com)

Complaints typically consist of:

- A description of the acts underlying the complaint, the steps already taken by the applicant, including legal actions within or outside Ireland or Luxembourg
- In the case where the person acts on behalf of an applicant or on behalf of a legal person, an original document or certified true copy of such document showing that the person is legally entitled to act so;
- a copy of a valid ID document of the applicant (natural person) and, where the applicant is a legal person, of the natural person representing this legal person.

The above is the minimum level of information to be provided so as to consider the request as a complaint. Requests for information or explanations are not considered as a complaint.

The Complaints Handling Officer will respond in writing within ten (10) business days after receipt of the complaint, either to acknowledge the receipt of the complaint or to provide a response to the applicant.

If for any reason the complaints handling process does not result in a satisfactory response, the applicant can contact the home country regulator of the CIS in respect of which such applicant notified a complaint.

The detailed procedure can be found under the following links: <https://www.cssf.lu/en/customer-complaints/> for CIS domiciled in Luxembourg and <https://www.centralbank.ie/contact-us/make-a-complaint> for CIS domiciled in Ireland.