Executive Summary of the Complaint Policy and Procedures for Citco C&T (Luxembourg) S.A.

Summary

This document is an executive summary of Citco C&T (Luxembourg) S.A.’s (“CCTLU”) Complaint Policy and Procedures (the “Policy”) which addresses how to deal with complaints our clients and their relevant counterparties may have and want to lodge with CCTLU. It has been prepared in accordance with Article 15(1) of CSSF Regulation 13-02.

The Purpose of the Policy

The purpose of the Policy is to provide an internal procedure as required in Article 15(1) of the CSSF Regulation 13-02 on out-of-court resolution of complaints.

Core features of the Policy

- **Resolution of Clients Complaints** CCTLU recognizes that Article 15(4) of CSSF Regulation 13-02 allows for ten business days to respond to client complaints and one month for complaint resolution.

- **Contact person of CCTLU** The Account manager of the client within CCTLU is the contact person with whom the client should communicate. In accordance with Article 15 of CSSF Regulation 13-02 CCTLU will provide this information to local manager if it is not readily known.

- **Referral to Board of Directors** where the client does not receive a satisfactory answer from CCTLU in the first instance, CCTLU will refer him/her to the Board of Directors and provide if requested the contact details of the relevant individual in accordance with Article 15(3) of the CSSF Regulation 13-02.

- **Referral of Complaint to the CSSF** where the client does not receive a satisfactory resolution from CCTLU, CCTLU recognizes the right of the client to refer the complaint to the CSSF for out-of-court resolution.

- **Complaints Register** Each complaint and the measures taken to resolve these complaints must be registered and properly recorded in accordance with Article 15(3) of the CSSF Regulation 13-02.