

Complaints Handling Procedure

Anthos Fund & Asset Management B.V.



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1 Complaints handling

1.1 General

All (potential) clients, fund participants and other stakeholders (e.g. third parties Anthos Fund & Asset Management outsourced activities to, or service providers) of Anthos Fund & Asset Management (Anthos) must be able to state that they are not satisfied with the products and services provided by Anthos. Anthos defines a complaint as any formal statement of dissatisfaction by a client, fund participant or other stakeholder, relating to the products or services provided by Anthos, and that cannot be resolved directly in an amicable manner.

Complaints must be dealt with in an efficient and impartial manner. To guarantee that complaints are dealt with efficiently, Anthos ensures it actively follows up on complaints and makes sure these are handled carefully, verifiably, objectively, in a consistent way and without undue delay. This section outlines the policy of Anthos on complaints handling and the principles outlined in the next paragraphs shall be used as guidelines for taking adequate measurements in relation to complaints management and handling. Complaints are an important way for the management of Anthos to be accountable to its clients, fund participants, stakeholders and the public and Anthos aims to be able to identify and take away the causes and take adequate measures to prevent the recurrence of serious complaints.

Anthos publishes information on the complaints handling process on its website, including information on the way in which a complaint can be submitted to Anthos.

1.2 Complaints handling process

1.2.1 Introduction

A complaint shall be defined as any indication of dissatisfaction provided by the (potential) client, (potential) fund participant or other stakeholder through any channel of Anthos (e.g. phone or e-mail), by means of which Anthos regularly communicates with its clients and stakeholders.

An employee who receives a complaint should inform the Compliance Manager and the Board of Directors immediately upon learning of the existence of a complaint. The employee receiving the complaint should request the complainant to confirm its complaint in writing (this includes electronically, i.e. by e-mail), if the complaint is initially not received in writing. In addition, the employee should assess whether the complaint qualifies as an incident. If the latter is the case, in addition, the Incident management procedure has to be followed.

If it is a complaint that can be dealt with directly, in an amicable manner, the employee will do so (e.g. apologize for the inconvenience, provide the client with the requested information, or update the correct client details in Anthos' administration). If the employee is unable to resolve the issue directly and to the satisfaction of the complainant, the complaint should be dealt with in accordance with the complaints handling process as outlined in section 5.2.2. The Compliance Manager is responsible for coordination of handling complaints and ensuring these are adequately and timely dealt with.

1.2.2 Compliant handling process

When an employee is unable to resolve the issue directly and to the satisfaction of the complaint, the employee reports this to the Compliance Manager. The Compliance Manager takes over the handling of the complaint from the employee. The Compliance Manager confirms the receipt of the complaint to the complainant promptly but in any case within three business days, and informs the complainant on the expected timeline for the complaint to be handled. Complaints will always be handled within a reasonable period, and not take any longer than necessary. Complaints will in principle be handled as soon as possible within a reasonable time frame.

The Compliance Manager ensures he/she obtains all necessary information to adequately respond to the complaint. This includes consulting internal systems to determine the course of action the complaint relates to, obtaining input from relevant employees involved in the client's case and, if required from the members of the Risk and Compliance department. The Compliance Manager assesses all relevant information and classifies the complaint. If deemed necessary, additional information from the complainant will be requested and in doing so the complainant will be informed of the timelines for providing this information.

Based on the assessment of the complaint, the Compliance Manager formulates, in cooperation with the employee, an initial response to the complaint. The Compliance Manager advises the Board of Directors in writing. The Board of Directors decides upon the handling of the complaint and shares the decision with the Compliance Manager and, if applicable (depending on the decision of the Board of Directors), also with CA&S. CA&S informs the complainant of the response to the complaint and explains the options available to escalate the complaint.

1.2.3 Escalation process

If a complainant is not satisfied with Anthos' response to the complaint, the complaint is escalated to the Board of Directors. By means of the escalation of the complaint, complainants are offered an extra internal option with Anthos to seek a solution for their complaint. The Compliance Manager will inform the Board of Directors of the escalated complaint. The Board of Directors will assess the complaint, the situation it sees to and the way in which Anthos initially dealt with the complaint. The Board of Directors will draft a response and discusses this with the Compliance Manager. The complainant is informed of Anthos' response to the escalated complaint. In this reaction, Anthos also informs the complainant of the opportunity to go to (civil) court, in case the complainant is still not satisfied with the solution presented by Anthos.

1.2.4 Record keeping

Separate complaints records are kept by the Compliance Manager for every complaint, detailing the date and nature of a complaint. The records are also used to keep track of discussions, correspondence and other relevant documents in relation to the complaint. The Compliance Manager registers the complaint and all details relating to the complaint in the complaints register. The following information on the complaint will be included in the complaints register:

- nature of the complaint;
- personal information of the complainant (name, address, contact details);
- date / time caused;
- date / time observed;
- persons concerned;
- classification of the complaint;
- way in which the complaint is resolved and the date thereof;
- measures taken; and
- consequences, if possible quantified.

All complaints records are kept for at least seven years after the complaint was resolved.

1.3 Compensation

Clients or fund participants may claim compensation from Anthos. Anthos may, in certain cases, grant compensation in response to a complaint. Any decision on granting compensation is made by the Board of Directors of Anthos.

Compensation may be requested, for example, if fund participants suffer a material loss, caused by:

- an error in the determination and/or the publication of the Net Asset Value (NAV) per share;
- subscription(s) and/or redemption(s) of investments at an incorrect NAV per unit; and
- incorrect information that form the base of investment decisions provided by Anthos.

Please refer to the Valuation Policy, that further details the compensation.

1.4 Periodic review

The Compliance Manager of Anthos monitors the complaint handling process by means of, amongst others:

- monitoring the complaints register for accuracy and completeness;
- identifying causes for complaints and proposing adequate measures to remove the causes and prevent the recurrence of serious complaints; and
- assessing whether complaints relate to situations that constitute violations (potentially or otherwise) of this Regulatory Compliance Manual or policies and/or applicable laws and regulations, and assess if this is systematic.

The Compliance Manager periodically, at least annually, analyses the complaints Anthos to identify recurring or systematic issues and potential risks relating to the business activities of Anthos. The Compliance Manager reports at least annually to the Board of Directors on the results of the monitoring activities relating to the complaints handling process of Anthos.

The Compliance Manager provides an overview of the complaints (if any) in the Compliance report and submits this report to the Board of Directors on a quarterly basis.

1.5 Reporting to AFM

The Compliance Manager periodically reports to the AFM on complaints handling by Anthos. The Compliance Manager provides the required information to the AFM through the annual 'Market Monitor' of the AFM.