

## Complaint handling procedure

APIS ASSET MANAGEMENT (the “Company”) is agreed as a fully licensed AIFM (Alternative Investment Fund Manager) pursuant to article 5 of the AIFM Law of 12 July 2013 (the « AIFM Law ») and a Management Company pursuant to Chapter 115 of the UCI Law of 17 December 2010 (the “UCIS Law”). The Company is subject to the CSSF supervision.

The Company is also authorized to perform some of the services contemplated in article 5(4) of the AIFM Law, like individual portfolio management (discretionary and advisory) or reception and transmission of orders (RTO) on financial instruments.

The Company discloses, in accordance with CSSF Regulation 16-07, a complaints handling procedure relating to the activities for which it is responsible.

Each complaints must be sent in writing, preferably in English, German, Luxembourgish or in French, together with supporting documents:

- By postmail

**APIS ASSET MANAGEMENT**  
**For the attention of the Compliance Officer**  
**22, rue de l’Industrie**  
**L-8399 Windhof**

- By email at [info@apis-am.com](mailto:info@apis-am.com)
- By fax: +352 2799 999 99

The complaint shall be completed with the following information:

- Full name of the complainant (individual or legal entity)
- Birthdate and birthplace (incorporation date for legal entity)
- Complete address, telephone, fax and email
- Contact name and email (legal entity only)
- Action of behalf of... (as the case may be)
- Relevant sub-fund or ISIN code
- Holding period and holding evidence
- Complaint description and relevant documentation.

A written acknowledgement of receipt will be sent to the applicant within 10 Luxembourg business days after receipt of the complaint.

The Company commits to provide within 30 Luxembourg business days either a feedback on the complaint to the applicant or, if further investigations are required, a firm commitment on a date to answer, with an explanation of delay reasons.

The Company undertakes to resort to the out-of-court complaint resolution procedure with the CSSF.



The applicant is informed of its possibility to escalate its claim to the CSSF, following the terms and conditions described in CSSF Regulation 16-07, relating to out-of-court -complaint resolution (<http://www.cssf.lu>).

The request must be filed with the CSSF within one year after the claim has been sent to the Company:

- By postmail  
CSSF  
Département Juridique  
283 Route d'Arlon  
L-2991 Luxembourg
- By email at [reclamation@cssf.lu](mailto:reclamation@cssf.lu)

Using the form available at the CSSF website.

The extensive Complaint handling procedure can be obtained with no charge at:

**APIS ASSET MANAGEMENT**  
**22, rue de l'Industrie**  
**L-8399 Windhof**