

HANDLING CUSTOMER COMPLAINTS

PROCEDURE

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1. VERSIONING

Version	Date	Modifications	Auteurs
1.0	26.10.2020	Update of the previous version in view of regulations and CSSF recommendations	Isabelle ROUX
1.1	4.12.2024	review	Isabelle ROUX
1.2.	4/09/2025	review	Isabelle ROUX

2. INTRODUCTION

This procedure aims to implement CSSF Regulation 16-07 of 26/10/2016 on the out-of-court resolution of complaints, as specified by CSSF Circular 17/671 amended by CSSF Circular 18/698.

According to Article 15 (1) of the aforementioned Regulation, "each professional must have a complaints management policy. This policy must be defined, implemented, and approved by the management of the professional. The complaints management policy must be set out in a written document and formalized in an internal complaints handling procedure, made available to the relevant staff."

3. OBJECTIVES

The purpose of this complaints handling procedure is to facilitate the resolution of complaints against professionals without resorting to judicial proceedings.

3.1. DEFINITIONS

In accordance with Article 1 of the aforementioned Regulation, the following terms are defined as:

- "CSSF": the Commission de Surveillance du Secteur Financier.
- "Professional": any natural or legal person subject to the prudential supervision of the CSSF.
- "Complainant": any natural or legal person who has lodged a complaint with a professional.
- "Complaint": a grievance lodged with a professional to assert a right or remedy a harm.

3.2. POTENTIAL COMPLAINT HANDLERS

All complaints will be initially analyzed by a manager who is a member of the professional's staff, depending on the subject matter of the complaint. The potential handlers are as follows:

ACCOUNTING & FINANCE DEPARTMENT

Sonia CHERET-MANGIN Finance Director Email:
[sonia.CHERET@trustteam.lu] (mailto:sonia.CHERET@trustteam.lu)

SALES DEPARTMENT

Thierry BOUSEFSAF Sales Director Email:
[thierry.BOUSEFSAF@trustteam.lu] (mailto:thierry.BOUSEFSAF@trustteam.lu)

TECHNICAL DEPARTMENT

Quentin SAVARY Technical Director Email:
[quentin.SAVARY@trustteam.lu] (mailto:quentin.SAVARY@trustteam.lu)

STAFFING & RECRUITMENT DEPARTMENT

Céline SERE DE LANAUZE HR Director Email:
[celine.SEREDELANAUZE@trustteam.lu] (mailto:celine.SEREDELANAUZE@trustteam.lu)

3.3. MANAGEMENT RESPONSIBLE

In accordance with Article 15 of the aforementioned Regulation, the management responsible is in charge of implementing and ensuring the effective operation of this procedure. In the event of no response or an unsatisfactory response at the first level, the complainant may request the application of this procedure and thus the analysis at the second level by the management responsible whose contact details are mentioned above. The contact details of the aforementioned responsible persons are as follows:

Alain MARINGER Managing Director

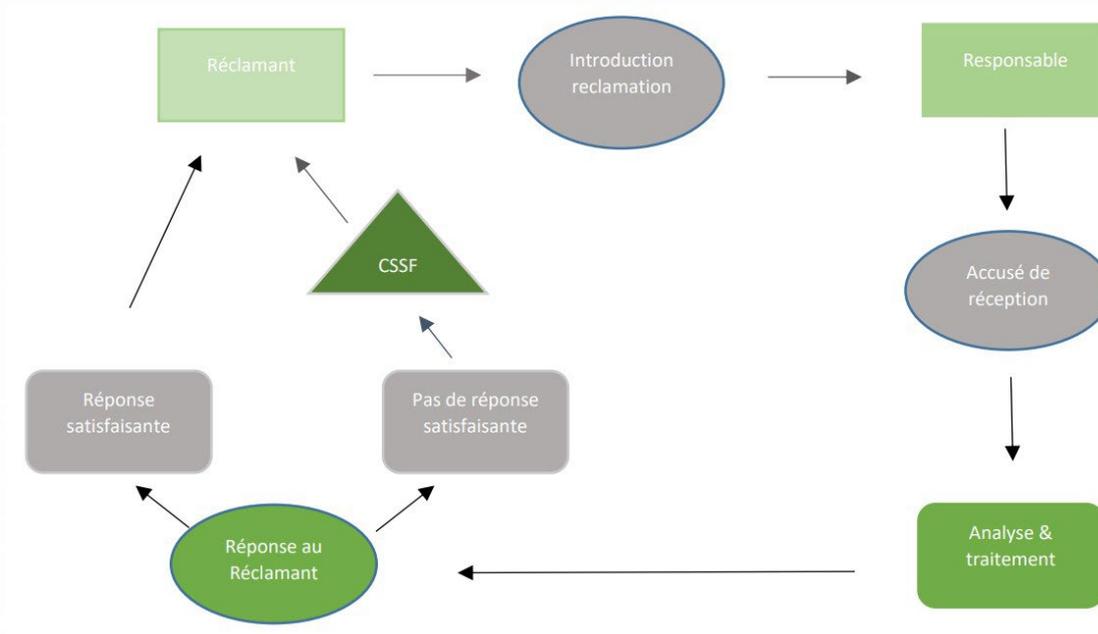
Email: [alain.MARINGER@trustteam.lu] (<mailto:alain.MARINGER@trustteam.lu>)

Isabelle ROUX Managing Director

Email: [isabelle.ROUX@trustteam.lu] (<mailto:isabelle.ROUX@trustteam.lu>)

3.4. COMPLAINT HANDLING PROCEDURE

PROCESS FLOWCHART



FIRST STEP

The complainant may contact the responsible person by submitting a complaint via an online form.

SECOND STEP

The responsible person acknowledges receipt of the complaint in writing within 10 calendar days from the date of receipt of the complaint. The acknowledgment of receipt includes the following information:

- The reference number assigned to the complaint;
- The contact details of the responsible person;
- The contact details of the manager in charge of the complaint.

THIRD STEP

The responsible person conducts a thorough analysis of the data described in the complaint to identify the issue, the related solution, and systematically identify any potential recurrence as well as the associated legal and operational risks.

FOURTH STEP

The responsible person sends a written response to the complainant within one month from the date of receipt of the complaint. If the response is satisfactory, the complaint file is considered definitively closed. If the response is unsatisfactory, the responsible person will inform the complainant in accordance with the provisions of Article 15 of CSSF Regulation 16-07 as described below.

3.5. OUT-OF-COURT RESOLUTION OF COMPLAINTS WITH THE CSSF

In accordance with the aforementioned Article 15, when the handling of the complaint has not provided a satisfactory response to the complainant, the responsible person provides the following information:

- A complete explanation of their position regarding the complaint;
- Written information about the existence of the out-of-court complaint resolution procedure with the CSSF;
- A copy of the aforementioned Regulation, as well as the various means of contacting the CSSF to submit a request. In this case, any complaint can only be submitted by the complainant to the CSSF within a maximum period of one year from the date on which the complainant lodged their complaint with the professional.

3.6. COLLABORATION BETWEEN THE PROFESSIONAL AND THE CSSF

GENERALITIES

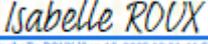
As a support PSF, the professional must comply with a substantial number of obligations set out by regulations or recommendations from the CSSF. Furthermore, compliance with these recommendations and legislative requirements is subject to an annual internal audit as well as an external audit. In accordance with Article 16 of the aforementioned Regulation, the professional also ensures perfect collaboration with the CSSF in the implementation of the out-of-court complaint handling process and transmits to the supervisory authority all necessary information and data to ensure the adequate handling of out-of-court complaints.

ANNUAL COMPLAINTS TABLE

in accordance with the provisions of Article 16 (3) of the aforementioned Regulation, the responsible person communicates to the CSSF, on an annual basis, a table including the number of complaints recorded by the professional, classified by type of complaints, as well as a summary report of the complaints and the measures taken to address them. This table is sent by the professional to the CSSF before March 1st of the year.

4. IMPROVING AND REVIEW

This policy has been reviewed and approved by the **Management Committee** to ensure alignment with organizational objectives, regulatory requirements. The organisation will implement supporting procedures to operationalise this policy, monitor adherence, and review its effectiveness at least annually, or upon significant changes to business, legal, or regulatory requirements.

Role	Name	Date & Signature
Managing Director	Alain MARINGER	 <small>Alain MARINGER (Sep 15, 2025 14:03:25 GMT+2)</small>
Managing Director	Isabelle ROUX	 <small>Isabelle ROUX (Sep 15, 2025 12:31:44 GMT+2)</small>