

COMPLAINTS HANDLING POLICY

July 2024

17A, rue des Bains
Luxembourg • L-1212

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Policy Owner	Compliance Officer
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1. Introduction

Nevastar Finance (Luxembourg) S.A. (the **Company**) is a management company incorporated under Luxembourg law and subject to Chapter 15 of the Law of 17 December 2010 relating to undertakings for collective investment (the **2010 Law**).

As such, the Company complies with the rules set forth by the CSSF Circular 18/698 relating to the authorisation and organisation of investment fund managers incorporated under Luxembourg law (the **Circular 18/698**).

The Company places a high value on ethical legal behaviour and its good name and reputation, and expects all employees and associated individuals to be aware of their professional obligation to transact their business affairs in a legal and ethical manner. The Company views complaints as a client's expression of dissatisfaction about the provision of services or product offered and consider that all complaints should be treated seriously, even minor, since a pattern of minor complaints may indicate a more serious issue.

It is the Company policy to handle any complaint promptly and courteously and in accordance to with the relevant Luxembourg laws and regulations.

The name of the Conducting Officer responsible for handling, centralising and monitoring complaints is communicated to the CSSF. That is the CO in charge of the Compliance function.

2. Complaints handling principles

The Company, applying the present policy and related procedures, shall ensure that the following principles are applied when dealing with a client complaint:

- there is a proper handling of complaints;
- complaints are independently reviewed;
- any appropriate remedial action following a complaint is taken on a timely basis;
- where the complainant is of the opinion that the complaint is not, or has not been, promptly or satisfactorily resolved, that the complainant is advised of any further avenue for complaint available to them; and
- complaints are properly recorded, documented and reported in accordance with local regulatory requirements.

3. Submission of a complaint to the Company

Any complaint shall be filed in writing using the following channels. The information is available on the website of the Company:

17A, rue des Bains
Luxembourg • L-1212

By email: complaintsLU@nevastar.com

By post:

Nevastar Finance (Luxembourg) S.A.

17A, rue des Bains

L-1212 Luxembourg

Attn: Complaints Handling Department

Phone: +352 27 48 72 1

Fax: +352 27 48 72 48

4. Complaints dealing principles

Upon notification of a complaint, the Company will take the steps necessary to determine the basis of the complaint and will:

- ensure the complaint is acknowledged in writing to the client within **5 business days** from its receipt and that the client is informed of the name and contact details of the person in charge of the complaint;
- seek to gather further relevant information and evidence as part of the investigation into the complaint;
- provide a final written response to the client either by letter or electronic mail regarding the outcome of the investigation and the actions taken to resolve the complaint as soon as practicable and in any event no later than **1 month** from the date of the receipt of the original complaint;
- Where it is not possible to provide a response within such timeframe, the Company will inform the client about the cause of the delay and provide a date by which the complaint may be resolved.

No complaint shall remain unanswered by the Company. Where a complainant does not deem the response received to be satisfactory, the Company will propose the following escalation processes:

- further internal escalation to the Board of the Company; and / or
- use of the CSSF out-of-court complaint resolution procedure as set out in CSSF Regulation No. 16-07 and CSSF 18/698.

All complaints are treated as confidential.

5. Policy Ownership

The Policy shall be approved by the management committee (**MC**) and the board of directors (**Board**) of the Company.

The Policy shall be reviewed at least once per year and updated / modified anytime necessary by the compliance officer. Any material changes shall be approved by the MC and the Board.