



Complaints handling statement

December 2022

1. Scope and purpose

The complaints handling policy (the “Policy”) of Praesidium S.A. (“Praesidium” or the “Company”) aims at implementing an appropriate internal structure and defining the internal responsibilities and instructions for the reception and the handling of complaints, to ensure that they are handled in a manner which is fair, objective, transparent, and truth oriented. The Policy also aims at enabling the identification and mitigation of any possible conflicts of interests.

2. Complaints handling officer

Mrs. Figen Eren has been appointed as Complaints Handling Officer. As such, Mrs. Figen Eren is responsible for acknowledging receipt of complaints, and is the point of contact for the CSSF to which her name has been communicated

3. Complaints filing procedure

Complaints are expected to be filed in writing to the attention of the Complaints Handling Officer at the following address or e-mail:

Praesidium S.A.
Attention: Complaints Handling Officer
11, rue Aldringen
L-1118 Luxembourg

E-mail address: figen.eren@praesidium.eu

Complainants will be able to file complaints in English and in Italian.

The following information shall be provided to ensure a prompt handling of the complaint:

- Identity and contact details of the complainant;
- Reason of the complaint and the resulting alleged damage or loss in relation thereof;
- Where necessary, copies of any documentation supporting the complaint.

The Complaints Handling Officer must send an acknowledgment of receipt in writing within (10) ten business days of receipt of the complaint, unless the answer itself is provided to the complainant within this period.

Such acknowledgment of receipt should contain the name and contact details of the person in charge and an indication on when the answer to the complaint can be expected. This time indication shall be within one (1) month after the receipt of the complaint.

The Complaints Handling Officer will seek to gather all relevant data and information that is necessary and investigate each complaint, as soon as it is received.

A clear, concise and exact response must be sent within one (1) month of the receipt of the complaint. If an answer cannot be provided within this time, the Complaints Handling Officer shall inform the complainant of the reasons of the delay and indicate the date on which an answer is likely to be achieved.

If the complainant did not obtain an answer or a satisfactory answer from the Complaints Handling Officer, it shall be given the opportunity to raise the complaint up to the Board. In this respect, the Complaints Handling Officer shall indicate to the complainant the means to contact the Board to escalate its complaint.

4. CSSF out of court resolution

The *Commission de Surveillance du Secteur Financier* (hereinafter “CSSF”) is the relevant authority for receiving complaints from customers of financial professionals under its supervision and for intervening with these professionals with the aim of settling these complaints amicably.

If within one month after having sent a complaint, in writing to Praesidium, the complainant has not received an answer or a satisfactory answer, the complaint is considered as admissible by the CSSF and the complainant can file a request for out-of-court complaint resolution with the CSSF.

The complainant may file his/her request with the CSSF within one year after s/he filed his/her complaint with Praesidium. The request shall be filed in Luxembourgish, German, English or French.

Details regarding the out-of-court resolution can be found on the CSSF website <https://www.cssf.lu/en/Document/circular-cssf-17-671/>
<https://www.cssf.lu/en/Document/request-for-out-of-court-complaint-resolution-with-the-cssf/>