

COMPLAINTS PROCEDURE

EXTERNAL

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1. PURPOSE AND INTENTION

Kuylenstierna & Skog S.A. ("K&S") aims to provide a high standard of service to all our clients. However, there may be times when something leaves you disappointed or dissatisfied. The following procedure summarizes the steps for making your complaint, and for K&S to resolve your concerns. The procedure is aligned with the current best practice and the relevant legal and regulatory requirements **Article 15(1)** of the **CSSF Regulation 16-07**: The Company shall have a complaint management policy that is defined, endorsed and implemented by the management of the Company.

The complaint management policy shall be set out in a written document and shall be formalised in an internal complaint resolution procedure made available to all relevant staff. This procedure shall be efficient and transparent, in view of the reasonable and prompt complaint handling in full compliance with the provisions of this regulation. It shall reflect the concern for objectivity and for ascertaining the truth. It shall also enable the identification and mitigation of any possible conflicts of interests.

Article 15(5) of the **CSSF Regulation 16-07** relating to where the complainant did not receive an answer or a satisfactory answer of his complaint, he will be provided Article 15(5) of the CSSF regulation 16/07 with a full explanation of the position as regards the complaint and be informed in writing of the existence of the CSSF procedure for the out-of-court resolution of complaints and sent a copy of the CSSF regulation 16-07, or reference to the CSSF website <https://www.cssf.lu/en/customer-complaints/>, as well as the different means to contact the CSSF to file a request.

This request must be filed with the CSSF within one year.

In the case of complaints within the meaning of point (5) of Article L. 411-1(1) of the Consumer Code:

- evidence of the existence and accuracy of the information provided
- the date at which it was provided is incumbent on the Company.

Please tell us if you are unhappy or have a complaint about any aspect of our service. Everything we learn from our clients helps us to consider changes that will meet your expectations in the future.

The purpose of this procedure is to ensure that it is easy for you to tell us about your complaint, that complaints are handled objectively, and that they are truth orientated. It is also important that complaint handling is dealt with the attention it deserves in a reasonably prompt fashion and that it is compliant with regulatory requirements. We also aim to satisfy you with how your complaint was resolved.

2. HOW TO COMPLAIN

Elisabeth Skog and Johan Kuylenstierna are appointed as **Complaint Handling Officer(s)** ("**CHO**") for the Company in Luxembourg as well as for the branch in Stockholm.

If you are not satisfied with any aspect of our service, you can tell us about your concerns in the following ways:

- **By telephone**

In the first instance we prefer to hear from you via telephone on; +352 22 95 15.

This way we can hear about your concerns, consider the issues raised, discuss your options, and attempt to resolve your concern straight away.

Where it is not possible to resolve your concern at the first point of contact, we will take full details of the issues raised and arrange for your complaint to be investigated internally. We may also ask you to provide details of your complaint in writing, should it be required.

- **In writing**

If you prefer to send your concerns by post, you can fill out our Complaint Filing Form in Appendix I, and file it via:

- E-mail: skog@k-s.lu; kuylenstierna@k-s.lu
- Post: Kuylenstierna & Skog S.A.
Complaint Handling Officer
74, Grand-rue, L-1660 Luxembourg

3. ACKNOWLEDGEMENT OF COMPLAINT

Our aim is to resolve your complaint at first point of contact.

If we are unable to do so:

- **a written acknowledgement of your complaint will be sent to you within ten business days.**

In this acknowledgement we will inform you of the name and contact details of the person in charge of resolving your complaint. If applicable, we may request further information to help us resolve your case.

4. RESPONSE

Once we have sent the acknowledgement of your complaint, we aim to resolve your case within one month.

In the meantime, we will keep you informed about the progress of your complaint, including any details of actions being taken to resolve your complaint.

We will investigate the complaint as follows:

- Seek to gather and to investigate all relevant evidence and information of the complaint.
- Seek to communicate in a plain and easily understood language; and
- **Provide an answer without undue delay** and in any case, **within a period which cannot exceed one month from the date of receipt of the complaint**, to the date on which the response to the complainant was sent by K&S. Where an answer cannot be provided within one month, the Complaint Handling Officer shall inform the complainant of the causes of the delay and indicate the date by which the examination is likely to be completed.

In exceptional circumstances, where the concerns raised are particularly complex, matters may take longer to resolve. Should that be the case, K&S will inform you of when we expect to reach a conclusion and indicate a date when we expect to revert to you with our final response.

In our final response, once issued, we will provide you with a full explanation of the outcome of our investigation. We will also make you aware of the existence of the Commission de Surveillance du Secteur Financier (“CSSF”) procedure for the out-of-court resolution of complaints and how to contact them, should you not be satisfied with our response.

5. OUT-OF-COURT COMPLAINT RESOLUTION

If you did not receive an answer or a satisfactory response to your complaint, the CSSF operates a process to facilitate out-of-court complaint resolutions between customers and financial institutions.

We will provide information about the CSSF regulation 16-07 in writing, together with information on how to contact the CSSF to file a request.

This information can also be found on the CSSF website: <https://www.cssf.lu/en/customer-complaints/>

APPENDIX 1



Complaint Filing Form

Date of Complaint Filing:	
Name of account/ Company concerned:	
Your name (including contact details):	Name: Address: Phone number: E-mail address:
Date of incident:	
Name of person the complaint is against, if applicable:	
Complaints details:	
Signature of Complainant:	