



Complaints Handling Policy

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1. Introduction and context

Candriam is an investment fund manager (IFM) licensed to act as management company as well as alternative investment fund manager (AIFM).

From time to time, Candriam and its branches and subsidiaries (all together referred below as “Candriam” or “the Company”) may receive complaints from Customers.

To ensure that the Company is aware of all complaints, and that such complaints are dealt with in an efficient, transparent and timely manner, this Policy must be followed. The Company is committed to take every concern of a complainant seriously. This Policy shall reflect the concern for objectivity and search for truth. It shall also enable the identification and mitigation of possible conflicts of interest.

The purpose of this Policy is to define the responsibilities and the process of Candriam’s complaints handling according to its principles of governance and to the local and EU regulation (in particular the CSSF Regulation N°16-07 relating to the out of court resolution of complaints Instruction, the Circular CSSF 18/698, section 5.5.5, the AMF – Traitement des réclamations – DOC-2012-07, the Belgian Royal Decree 12/11/12 (UCITS) and Royal Decree 25/2/17 (AIFM) and Commission Delegated Regulation (EU) 2017/565).

2. Definitions

2.1. Customer

Customers are counterparties with which the company has a business relationship (a “Third”, i.e. an entity with whom Candriam can or has established a Business Relationship according to the wording used in the client relation management platform named “Client Relationship Workflow” or “CRew”) and all investors in the investment funds managed by the Company, irrespective of the funds’ legal form and of the status of the investor within the funds’ distribution chain. This includes retail and institutional investors, natural and legal persons, appointed distributors and intermediaries.

2.2. Complaint

In general, a complaint occurs whenever a Customer raises a concern, a grievance or dissatisfaction about the execution of the Company’s activities. A complaint is filed to recognize a right or to redress a harm. Thus, simple requests for information or clarification cannot be considered as complaints.

In particular, a complaint may include, but is not limited to, any assertion by a Customer made in written of:

- improper conduct by the Company;
- breach of a rule or regulation by the Company, in particular those of the managed investment funds;
- operational failures;
- investment performance of the funds managed by the Company.
- The written complaints can be addressed via email, letter or by filing the form in the Candriam website. The complainant has the possibility to rise up its complaints directly to the management.
- A complaint request may include the following information:
 - Purpose of the request complaint (investment performance, operation failure...)
 - Preference of the way of communication of the complainant (email addresses, telephone, preferred language)
 - Contact detail of the complainant (name, surname, address, profession, company)
 - Description detail of the complaint



3. Process and communication

3.1. Process

No complaint as defined in this Procedure shall remain unanswered. The Business Unit Head concerned by the complaint is responsible for providing the response, respectively for its content. He/she may select an appropriate person ("the selected person") who shall communicate with the Customer and who shall prepare a written response.

The Business Unit Head or the selected person will gather and investigate all relevant evidence and information for each complaint. Furthermore the Business Unit Head or the selected person will communicate in a plain and easily comprehensible language. Every answer to a complaint must contain the opportunity to rise the complaint up to the level of the management of the Company. In this respect, every answer to a complaint shall also provide the contact details of the Conducting Officers of the Company. Moreover, each complainant is informed of the name and contact details of the person in charge of his/her file. During the whole internal complaints process the complainant shall only have one contact person as far as this is possible.

The written acknowledgement of receipt will be provided to the complainant within a period which shall not exceed 10 business days, respectively 5 business days for Belgian Clients, after receipt of the complaint, unless the answer itself is provided to the complainant within this period. In any case, the Business Unit Head or the selected person provides an answer without undue delay and within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the complainant was sent. Where an answer cannot be provided within this period, the Business Unit Head or the selected person will inform the complainant of the root causes of the delay and indicate the date at which its examination is likely to be achieved.

In case the complainant is not satisfied with the answer provided, the Business Unit Head or the selected person will provide him/her with a full explanation of his/her position as regards the complaint.

The complainant shall be informed in writing of the existence of the out-of-court complaint resolution procedure at the CSSF and will send him/her a copy of CSSF regulation 16-07 or the reference to the CSSF website, as well as the different means to contact the CSSF to file a request. The complainant shall be informed that such out-of-court complaint resolution procedure at the CSSF must be introduced within one year from the date she/he introduced the complaint with the Company.

A copy of the response must be forwarded to the Compliance Department of the Company by the Business Unit Head.

A Customer may file a complaint in any official language of his country, free of charge, and the communication should clearly indicate that it is a complaint. A complaint must be received in written, either by e-mail at complaints@candriam.com or by another written mean addressed to the Company.

Note: oral complaints do not constitute sufficient formalization, they are not taken into account in this process. If an oral complaint is received, the recipient shall suggest the complainant to formalize it in written.



3.2. Communication

Candriam has established and maintains a complaints management information for Customers or potential Customers. The complaints management information is aimed at providing clear, accurate and up-to-date information about the complaints-handling process.

Those guidelines are endorsed by the Company's management bodies and published on Candriam's website:

<https://www.candriam.com/en/professional/legal-and-disclaimer-Candriam/Complaints-Procedure/>

In line with the regulations in force in Luxembourg, Belgium, France and in every country where Candriam has a branch or a subsidiary, Customers are invited to visit the Candriam website for information on how to file, free of charge, a complaint in the official language (or one of the official languages) of their home State. This information is also provided to Customer or potential Customers, on request, or when acknowledging a complaint.

Candriam also details the option, where relevant, for the Customer to refer the complaint to an Alternative Dispute Resolution entity through its website.

In Luxembourg, it informs investors who subscribed to Luxembourg-domiciled funds of the process for filing a complaint, with the CSSF – in accordance with the provisions of in CSSF regulation n° 16-07. On the website, Candriam also provides detail of other local mediators for its branches and subsidiaries.

