



SMBC NIKKO

SMBC Nikko Investment Fund Management
Company S.A.

CUSTOMER COMPLAINT HANDLING PROCESS

SMBC Nikko Investment Fund Management Company S.A. (the “Company”) has created a “Complaint handling procedure” in order to facilitate the resolution of complaints against the Company without judicial proceedings.

The complaint handling procedure has been designed to:

- ensure that any complaint of any customer of SNIF will be forwarded and adequately answered by the duly appointed central complaints handling officer (hereafter referred to as CCH Officer) of SNIF. At the date of the Procedure, the compliance officer of SNIF is appointed as CCH Officer.
- comply with the requirements set out in the Commission de Surveillance du Secteur Financier (the “CSSF”) the CSSF Circular 17/671 giving precisions relating to the CSSF Regulation Nr 16-07 effective 11th November 2016 relating to the out-of-court resolution of complaints (the “CSSF Regulation Nr 16-07”). The CSSF Circular 17/671 aims at updating the CSSF Regulation Nr 16-07 and laying down in detail the framework within which the CSSF handles complaints and provides further clarifications on the obligations incumbent upon SNIF in connection with the internal handling of the complaints submitted to it.

This “Customer Complaint Handling Process” provide details of the process to be followed by a customer as more fully detailed in the Company “Complaint handling procedure” designed to explain how a customer can lodge a complaint and the steps to be followed by the Company to handle such complaint.

How to complain?

Any customer wishing to address a complaint to the Company is invited to provide the Company at compliance@smbcnikko-ifmc.com with the following information:

- Name;
- Name of the representative, if any;
- Address/Phone number/E-mail address;
- Detailed description of the facts underlying the complaint; and
- Any document supporting the content of the complaint.

The complaint handling process is free of charge for customer

Complaint processes key features

Acknowledgement of receipt:

A written acknowledgement of receipt will be addressed to the complainant within a period, which shall not exceed ten (10) Luxembourg business days after receipt of the complaint, unless the answer itself is provided to the complainant within this period.

In the acknowledgement of receipt, the Complainant shall be informed of the name and contact details of the employee in charge of his/her file in the first instance.

Indicative timetable:

The company will issue a reasoned answer within one (1) month from the date of receipt of the complaint depending on the nature and the complexity of the complaint. The one (1) month-period starts running where the Company receives the complaint. The one (1) month-period may be extended in the case of complex files. In this event, the Company will inform the complainant of the approximate necessary extension.

Procedure for out-of-court resolution of complaints before the CSSF

By the present disclosure, the complainant is informed of the existence of an out-of-court complaint resolution procedure at the "Commission de Surveillance Secteur Financier" ("CSSF"). All the details regarding this out-of-court process can be easily obtained consulting the CSSF website using the following link: <https://www.cssf.lu/en/consumer/complaints/>

Laws, regulations and other texts and Circulars applicable:
CSSF Regulation N°16-07 relating to the out-of-court resolution of complaints

Circulars:

Circular CSSF 14/589 (only in French) 27.06.2014

Any other question regarding a complaint or this procedure can be sent by email to the Company at the address : compliance@smbcnikko-ifmc.com