

Customer Complaint Handling Process
of SMBC Nikko Investment Fund Management Company S.A.
(extract)

Customer Complaint Handling Process *(extract)*

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

The Process 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 the “CCH Officer”) of SNIF. At the date of the Process, the compliance officer of SNIF acts as CCH Officer.
- comply with the requirements set out in Circular 17/671 (“CSSF Circular 17/671”, as amended by Circular CSSF 18/698) of the Commission de Surveillance du Secteur Financier (the “CSSF”) giving precisions relating to the CSSF Regulation N°16-07 relating to the out-of-court resolution of complaints (“CSSF Regulation N°16-07”). CSSF Circular 17/671 aims at updating CSSF Regulation N°16-07 and laying down in details the framework within which the CSSF handles complaints and provides further clarifications on the obligations incumbent upon companies such as SNIF in connection with the internal handling of the complaints submitted to it.

The Process provides details regarding the process to be followed by a customer, as more fully detailed in the Process designed to explain how a customer can lodge a complaint and the steps to be followed by the Company to handle such complaint.

How can I lodge a complaint?

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

- Name;
- Name of the representative, if any;
- Address/telephone 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 customers.

Key features of the complaint process

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:

The complainant is informed of the existence of an out-of-court complaint resolution procedure at the CSSF. All details regarding this out-of-court process can be obtained on the website of the CSSF.

Sample of applicable regulation

- CSSF Regulation N°16-07 relating to the out-of-court resolution of complaints (October 26, 2016)
- Circular CSSF Circular 17/671 (October 13, 2017) as amended by Circular CSSF 18/698

Inquiries regarding a complaint or the Customer Complaint Handling Process can be addressed to the Company using the following e-mail address:

SNIF_Compliance@smbcnikko-ifmc.com