

## **COMPLAINTS MANAGEMENT POLICY**

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## 1. Introduction

The complaint management policy (hereafter « Policy »), made by the Authorised Management, is defining the objectives and responsibilities in cases of complaints made by the customers.

This policy is based on the current regulatory framework regarding the handling of Customer's complaints, specifically with the framework put in place by **the CSSF regulation n° 16-07 as well as the CSSF 17/671 circular**.

It is approved by the Board of Directors.

It will be frequently updated so that it reflects the evolutions of the regulatory framework.

## 2. Definition of a complaint and policy's objectives

A complaint is the expression of a « complaint filed with a professional to obtain recognition of a right or to redress a prejudice ».

The materialization and the registration of a complaint are specified in the procedure.

The complaint management policy provides the framework for the Customer complaints system. The setting up of such a system aims to:

- the continuous improvement in the quality of services offered to Clients ;
- Customer satisfaction ;
- *identify and address any recurring or systemic issues, as well as potential legal and operational risks, for example :*
  - *by analysing the causes of individual complaints to identify the common origins of certain types of complaints;*
  - *by examining whether these origins can also affect other processes or products, including those on which complaints are not directly related; and*
  - *by correcting these origins, when it is reasonable to do so.*

This applies to all Customers (natural or legal persons) who have filed a complaint with our company.

## 3. Roles and responsibilities

Frédéric Otto has been appointed to the CSSF as the person responsible for handling complaints.

Each employee of Arche Wealth Management has the obligation to communicate without delay any Customer complaints to:

- Its direct hierarchy;
- Compliance Officer for analysis and follow-up.

Each complaint will then be communicated to the Authorised management which will provide the answer to the Customer.

#### **4. Ways of communication of a complaint by a client**

Each client of Arche Wealth Management can transmit its written complaint, in French or in English:

- by e-mail at the following address : [contact@arche-wm.com](mailto:contact@arche-wm.com) with the subject « Complaint».
- by post at the following address :  
Arche Wealth Management S.A  
A l'attention du Chief Compliance Officer  
37 A avenue JF Kennedy  
L-1855 Luxembourg
- by fax to the attention of the Chief Compliance Officer with subject « Complaint» at the following number : +352 26 00 29 00

An acknowledgment of receipt will be sent to the client within 48H of receipt.

Within 15 days, the Authorised Management will send a first answer to the client.

In case of unsatisfactory answers (difference of opinion between the client and the Company) from Arche Wealth Management, AWM has the obligation to inform the claimant of the existence of the extrajudicial procedure of the CSSF, to provide him the Regulation 16-07, the ways to contact the CSSF and that the claimant can introduce his request to the CSSF within one year maximum.