



COMPLAINTS PROCEDURE



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Preamble

This Policy relates to the activity of LFM&P as a UCITS management company operating in multimangement (i.e. investment in third-party UCI) and to the principle of proportionality regarding a smaller establishment with a simple structure and management model.

1. Introduction

Every UCI management company must *“establish, implement and keep efficient, operational and transparent procedures for the reasonable and rapid handling of complaints submitted by the investors”*.

In accordance with these rules, Leleux Fund Management & Partners (hereinafter referred to as “the Company” or “LFM&P”) is required to maintain and provide guidance on how it receives and processes the complaints lodged against the Company, its partners and its staff. This obligation stems from article 23 of the Royal Decree of 12 November 2012 concerning undertakings for collective investment management companies that meet the conditions of directive 2009/65/EC.

Leleux Fund Management & Partners takes all necessary and reasonable measures to ensure the identification and processing of all complaints using a fair and impartial approach. In addition, the complaints data is used to highlight any problems or shortcomings related to service and to provide an impetus for changes to improve the client’s experience.

As a result, the Company has established a procedure aimed at processing and resolving complaints effectively, efficiently and professionally.

1. Objective

The Company seeks to maintain and improve its reputation for high-quality services. The Company uses the complaints to improve its services.

This Procedure is intended to process the complaints lodged with LFM&P.

This procedure must, when implemented, ensure that these different requirements are satisfied:

- to be consistent and fair in the processing of the client’s complaint;
- to investigate impartially with a balanced view of all the information and evidence collected; •
to take reasonable measures to actively protect the client’s personal details;
- to take account of the circumstances and individual needs.

2. The complaints process



Under the terms of this Policy, a complaint is defined as follows: *an expression of dissatisfaction by a client concerning a service provided by the Company.*

3. Our measures

The Company has adopted measures to deal with complaints, which are summarised below.

Complaints can be submitted:

By post:

Leleux Fund Management & Partners SA
Service des Plaintes
Rue du Bois Sauvage, 17
1000 Brussels
Belgium

By email: plaintes@lfmp.be

3.1. Complaints officer

The person responsible for processing complaints within the Company must have the objectivity and independence needed to accomplish this task. They must also have sufficient knowledge to execute this mission properly and sufficient information about the internal procedures in force. LFM&P has identified ... as the person responsible for handling complaints to the CEO/CFO under the supervision of the Compliance Officer.

3.2. Procedures

If a client is dissatisfied with a service provided by the Company, he must contact the Complaints Officer directly.

The Company adopts the following measures:

- The Complaints Officer must take responsibility for the complaint;
- **Within three working days** of receiving a complaint, an acknowledgement of receipt must be sent to the client;
- The Company makes an initial examination of the complaint and determine whether any additional information or documents or needed for an investigation;
- The Company might need to contact the client to obtain additional information if necessary;
- **Within a period of two weeks**, in principle, of sending the acknowledgement of receipt, a final response must be given to the client;
- The Company will record the complaints for the continuous improvement and monitoring processes by means of a regular examination.

3.3. Information required



When the Company investigates a complaint, it relies on the information provided by the client and information the Company already has.

For the Company to process a complaint rapidly and efficiently, the following information is necessary to consider the complaint as being valid in terms of form and substance:

- The client's contact details (to check the database information);
- The nature of the involvement with the Company;
- The responsible person;
- The nature of the complaint;
- The details of all measures already taken to resolve the problem;
- Copies of all documents supporting the complaint.

3.4. Response to a complaint

The Company acknowledges receipt of the complaint within the time limit set out above. The Company will make every effort to resolve the complaint within two weeks of receiving it, provided it is valid and complete. If the investigation takes more than two weeks, the Company must inform the client of the reasons for the delay.

When the Company has completed its investigation, it provides a written response on a durable medium.

all written correspondence to the client must contain a reference to the possible next steps and the procedures already ongoing (e.g. Investigation by the Compliance Officer and transmission to the Executive Management).

3.5. Register

The Company maintains and regularly updates a complaints register containing the following information in particular:

- The name and contact details of the complainant;
- The facts of the complaint;
- Measures taken in response to the investigation into the client's complaint;
- Communications between the Company and the client.

The information contained in the register improves the management and eases the problems identified.

Personal information will be recorded in accordance with the legislation in force on the protection of privacy and the Company's data protection policy.

3.6. Monitoring and follow-up

The complaints will be analysed by the Compliance Officer on a quarterly basis to identify recurrent problems. If such problems are identified, the Company will determine the actions needed to resolve them.



The complaint procedure will be reviewed periodically and at least once a year by the Executive Management to improve its results.

4. Website

Clients are informed of the existence of the complaints procedure by a reference on the Company's website and in the General Terms and Conditions.

5. Ombudsfm

Leleux Invest is a SICAV managed by Leleux Fund Management & Partners SA and is a member of the Belgian Association of Asset Managers (BEAMA). If it is not able to resolve a complaint within eight weeks, or if the solution provided to the client is not satisfactory, the client may send the complaint to the Ombudsfm service.

Additional information on the procedure can be found at the following link:

<https://www.ombudsfm.be/en/individuals/introduce-complaint/>

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Document approved and validated by the Board of Directors of Leleux Fund Management & Partners
10/02/2019

