

Client's Complaint processing policy

In accordance with Delegated Regulation (EU) 2017/565 of 25 April 2016 and in particular recital 38 and Article 26 concerning the processing of complaints, ABN AMRO - ODDO BHF B.V. (AA-OB) maintains a client's complaints processing policy addressed by clients or potential clients with a view to their processing as soon as possible in a language that is simple and easy to understand.

A claim or complaint (herewith referred only as "complaint") will be understood as any statement of the client's dissatisfaction related to the provision of an investment service or ancillary service by AA-OB. A request for information, advice, clarification of service or delivery of service cannot be considered as a complaint.

AA-OB uses a uniform description for Complaints which distinguishes between the different categories of Complaints. This allows for monitoring trends within complaint handling. AA-OB distinguishes the following categories of Complaints:

Immediately resolved Complaint:

The receiving Employee who handles the Complaint, supported by the aids intended for this purpose, resolves the Complaint for the Client.

> Not immediately resolved Complaint:

The receiving Employee cannot resolve the Complaint and must refer to another department.

Escalation Complaint:

The Client is dissatisfied with the handling and/or outcome of the Complaint and decides to escalate the Complaint. Escalation Complaints are dealt with by the Risk & Compliance Officer.

> Appeal Complaint:

A Complaint in which the Client has referred the matter to an external alternative dispute resolution entity (Court of Justice).

• Organization of complaints processing

Each client is invited to submit their complaint to their usual commercial contact. In the absence of a response from the latter, the client may address their complaint, indicating in the subject of the correspondence "complaint - strictly confidential " to the Head of the department.

Clients or potential clients can also send their complaint by email to the Risk & Compliance Officer (<u>Compliance@aa-ob.com</u>).

• Complaints handling timeline:

AA-OB acknowledges receipt of the complaint within a maximum of 5 working days from the date of receipt of the complaint unless the response itself is provided to the client within this period. AA-OB processes and responds to the complaint within a maximum of two months from the date of receipt of the complaint, except in the event of special and duly justified circumstances between the date of receipt of the complaint and the date of dispatch of the response to the client.

• Registration of Complaints:

AA-OB has a registration process where employees must register every complaint received with the following data:

- date the complaint is issued;
- to what product or what type of service the complaint relates;
- what activity causes the complaint (root-cause);
- how the complaint has been handled: rejected, granted or ex gratia award;
- the Employee/department that has handled the complaint;

If the cause of the complaint could also affect other clients, AA-OB will investigate whether it is necessary to adopt a proactive approach.



AA-OB will ensure that the registration of complaints enables:

- > registering complaints of all clients and prospective clients;
- > accessibility of details of complaints to employees;
- distinguishing between AA-OB products and third-party products or services, including from its shareholders;
- > Perform a root cause analysis on the complaints in order to determine if processes have to be enhanced.

• Regulatory reporting:

As per Article 26 paragraph 6 of the Delegated MiFID II Regulation (EU) 2017/565, AA-OB is required to provide information about complaints and complaint handling to the Dutch Regulator, AFM. AA-OB must provide this information via the annual survey of the market monitor for investment firms. The Risk & Compliance Officer is responsible for providing consolidated reports to the AFM.