

Version 3.2

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Validated by the Board of Directors

COMPLAINTS HANDLING POLICY

I. Guidelines

Pure Capital S.A. is a management company pursuant to Chapter 15 of the Law dated 17 December 2010 relating to undertakings for collective investments and is also an alternative investment fund manager (hereafter “AIFM”) pursuant to Chapter 2 of the Law dated 12 July 2013 relating to AIFMs.

Pure Capital S.A. has adopted this complaints handling policy (the “*Complaints Handling Policy*” or the “*Policy*”) in accordance with the following regulations:

- CSSF Regulation 16-07 relating to the out-of-court resolution of complaints,
- CSSF Regulation 10-04
- CSSF Circular 17/671 (amended)
- The Law of 10 December 2010 relating to undertakings for collective investment
- CSSF Circular 18/698 on authorisation and organisation of investment fund managers incorporated under Luxembourg law

II. Complaints Handling Officer

Within the framework of the functioning of the Executive Committee, Mr. Thierry LEONARD is the conducting officer responsible for handling complaints and claims (“Complaints Handling Officer”).

M. Rudy HOYLAERTS, Chief Compliance Officer of the Company, is his substitute (“Substitute”).

III. Complaints introduced directly to Pure Capital S.A.

Reception

Written complaint

A client wishing to complain about the services rendered by Pure Capital S.A. must send the following information:

- Name, address and representative, if any;
- Reason of the complaint ;
- Department or offices subject to the complaint ;
- Place, date and signature.

On receipt of a letter, the original complaint is put in an ad hoc file once the following has been done:

- It has been stamped with the date of receipt ;
- A copy has been forwarded to the Complaints Handling Officer and his Substitute ;
- A copy has been forwarded to client relationship manager;
- A copy has been put in the client’s file.

Verbal complaint

A complaint transmitted verbally by a client, or by a third party, will be summarized in written form when it is considered to be significant. The summary is then treated in the same way as a written complaint.

Handling of a complaint

Guided by the desire for objectivity and the search for truth, Pure Capital S.A. will give an opinion and where possible, suggest an amicable solution acceptable to the client. Under no circumstances will Pure Capital S.A. attempt to camouflage or to cover a fault committed by it or by an employee. The reply to the client, whether it be positive or negative, must indicate the reasons for that reply.

Registration

Each complaint as well as each measure taken to handle it is properly registered.

Acknowledgement

Within 10 business days after receipt of the complaint: Pure Capital S.A. acknowledges receipt of the complaint promptly in writing , unless the answer itself is provided to the client within this period.

Conflict of Interest

As part of the complaints handling process, Pure Capital S.A., its Board of Directors, its Executive Committee, the Complaints Handling Officer, his Substitute as well as members of the Compliance and Legal department ensure that they comply with the Conflict of Interest Policy of the company.

Two cases:

- Simple complaint

All complaints are handled diligently. Pure Capital S.A. provides an answer within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the client is sent.

Pure Capital S.A. will use all means at its disposal to reply to the simpler complaints within a matter of days.

When preparing the answer, Pure Capital S.A. will:

- Provide the contact details of the Complaints Handling Officer and his Substitute ;
- Gather and investigate all relevant evidence and information on each complaint;
- Seek to communicate in a plain and easily comprehensible language.

- Complex complaint

All complaints are handled diligently. Pure Capital S.A. provides an answer within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the client is sent.

If the time necessary to prepare the reply is too long, the person responsible for complaints handling will inform the client of the causes of the delay and indicate the date at which its examination is likely to be achieved.

Client feedback

Where the complaint handling at the level of the relevant conducting officer did not result in a satisfactory answer for the client, Pure Capital S.A. shall:

- Provide him/her with a full explanation of his position as regards the complaint;
- Inform him/her in writing of the existence of the out-of-court complaint resolution procedure at the CSSF;
- Provide a copy of the CSSF regulation 13-02 or send him/her the reference to the CSSF website;
- Provide him/her the different means to contact the CSSF to file a request.

Should it come to light that a complaint has not been made in good faith, Pure capital S.A. must end the relationship with the client, which is no longer based on the necessary degree of trust, in a resolute and orderly manner.

IV. Complaints introduced in Belgium

In relation to the Belgian branch of Pure Capital S.A.(Luxembourg), the complaints shall be sent to :

*Pure Capital S.A., Belgium branch
c/o Mr Thierry LEONARD
20, Sneeuwbeslaan
2010 Wilrijk
Belgium*

The same procedure as outlined under section II will apply.

Should however no agreement be forthcoming, the client shall be entitled to submit a request for out-of-court complaint resolution to :

Ombudsfin

*North Gate II, Boulevard du Roi Albert II, n°8, bte. 2
1000 Brussels.
Tél. : +32 2 545 77 70
Fax : +32 2 545 77 79
E-mail : [Ombudsman\(at\)Ombudsfin.be](mailto:Ombudsman(at)Ombudsfin.be)
Site : www.ombudsfin.be*

V. Out-of-court resolution of complaints filed with the CSSF

Should the plaintiff consider that the treatment of his complaint by Pure Capital S.A. is unsatisfying, he is invited, within one year following the appropriate submission of his complaint to the Management Company, to address his complaint to the Luxembourg Financial Regulator, the CSSF in Luxembourgish, French, German or English. The request needs to be submitted in writing by post, fax or email at the following address:

*Commission de Surveillance du Secteur Financier
Département Juridique CC
283, route d'Arlon L-2991 Luxembourg*

reclamation@cssf.lu / Fax : + 352 26 25 1 - 2601

For the above purposes, the CSSF makes available a form on its website (<http://www.cssf.lu/consommateur/reclamations>) and invites the plaintiffs to complete and submit at the address mentioned in the above paragraph.

Confidentiality

The parties, on the one hand, and, on the other hand, the agents of the CSSF in charge of handling requests for the out-of-court resolution of complaints within the CSSF, are bound by an obligation of confidentiality and by the professional secrecy

The Board of Directors of Pure Capital S.A.