

CLIENT COMPLAINT MANAGEMENT POLICY

1. Introduction

Banque Transatlantique Luxembourg (the “Bank”) has put in place a system to manage client complaints, to ensure that any such complaints are processed in an efficient, transparent and timely manner, in strict compliance with the applicable regulations.

This system applies to all clients.

2. Definition of a complaint

A complaint is defined as the receipt by any traceable means of a written or oral communication from an individual or legal entity who is a client of the Bank and who seeks to assert a right or obtain redress for a wrong in connection with the services provided to the client by the Bank.

3. The processing of complaints

The Bank undertakes to process any complaint from a client free of charge in accordance with the following principles:

- transparency for the client
- objectivity
- desire to establish the truth
- traceability of every stage of the procedure to ensure that the complaint is processed appropriately and within a suitable time period in view of its level of complexity.

Clients should send complaints to their usual contact person, clearly stating that they wish to lodge a complaint.

Clients should provide the following minimum information: their account number, the service that the complaint relates to and a detailed statement of the reasons for the complaint.

The Bank will notify the client within ten days that the complaint is being processed, unless it resolves the issue within that time period. The notice will indicate the name and contact details of the person in charge of the complaint if this is not the client's usual contact person.

Any client who does not receive a satisfactory response from their usual contact person may forward the complaint directly to:

*Complaints Department
Banque Transatlantique Luxembourg
17 Côte d’Eich B.P. 884
L-2018 Luxembourg*

Clients will receive a detailed reply within one month of receipt of their complaint.

Clients will be promptly informed if, due to the complexity of the complaint, the matter cannot be resolved within one month.

4. Commission de Surveillance du Secteur Financier (CSSF)

If a client has not received a reply from the Bank within one month of making a complaint, or if the reply received is not satisfactory, the client may refer the matter to the Luxembourg financial regulator (CSSF) requesting its out-of-court resolution.

In that case, the client should submit a written application to the CSSF by post or by fax (contact details are displayed on the CSSF website at www.cssf.lu) or by using the form available on the CSSF website.