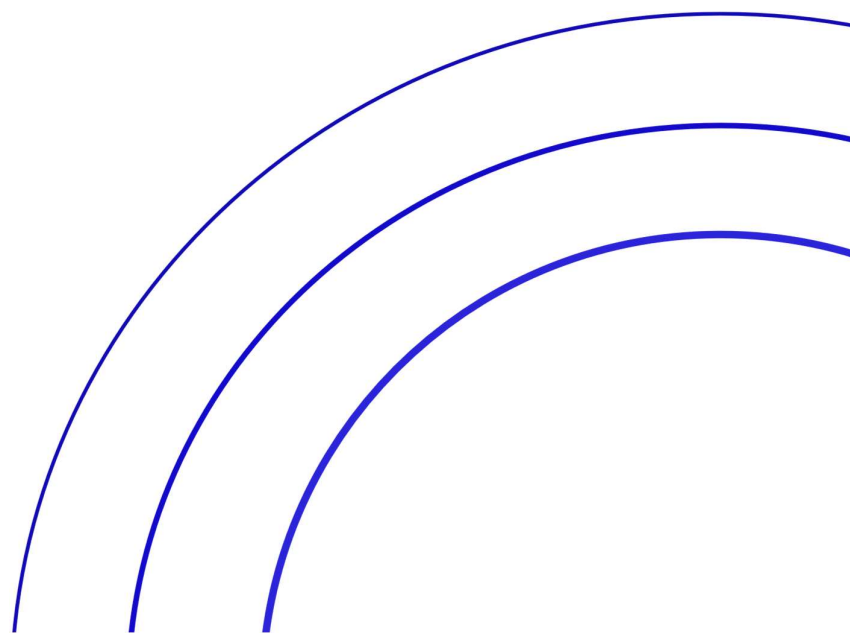




**Complaints Handling
Policy & Procedure**



Document Control

TITLE:	Complaints Handling Policy & Procedure	DOCUMENT REF NO:	CLIENT_LUX_001
DESCRIPTION:	This document sets out Calligo's policy for managing complaints and the process that should be followed to ensure regulatory compliance		
OWNER/ AUTHORITY:	Chief Operating Officer	VERSION NO:	2.0
CSSF Circular DOCUMENT CROSS REFERENCE:	<p>CSSF Regulation 10-04 of 22 December 2010;</p> <p>CSSF Regulation 16-07 of 26 October 2016 (which cancels and replaces CSSF Regulation 13-02 of 15 October 2013);</p> <p>CSSF Circular 17/671 (as amended by Circular CSSF 18/698) of 13 October 2017 (which cancels and replaces CSSF Circular 14/589 of 27 June 2014);</p> <p>CSSF Circular 18/698 of 23 August 2018;</p>	VERSION DATE:	[Publish Date]
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DOCUMENT OWNER & APPROVAL

The COO is the owner of this document and is responsible for ensuring that this procedure or process is reviewed in line with the review requirements of Calligo's Information Security Management System and Project Management Frameworks as well as the guidance and requirements of the CSSF.

Approved by Board of Directors, Calligo (Luxembourg) PSF on

CHANGE HISTORY RECORD

VERSION	DESCRIPTION OF CHANGE	AUTHOR	APPROVAL	DATE OF ISSUE
1.0	Original Version	Jason Petrucci		
2.0	New template and rewrite of the policy to update obsolete references	Jason Petrucci		

1. Introduction

1.1. Calligo (Luxembourg) PSF S.A

Calligo (Luxembourg) PSF S.A (the “Company”) with its registered offices at 7 rue des Mérovingiens Bourmicht, 8070 Bertrange, Luxembourg is a Professional of the Financial Sector (PSF) providing IT Managed Services to banks and other professionals of the financial sector in Luxembourg.

1.2. Scope

Calligo is committed to being responsive to the needs and concerns of our clients or potential clients and to resolving complaints as quickly as possible.

This policy has been designed to provide guidance to both our clients and employees on the manner in which Calligo receives and manages complaints. We are committed to being consistent, fair and impartial when handling complaints

The objective of this policy is to ensure:

- Our clients are aware of our complaint lodgement and handling processes,
- Both our clients and employees understand our complaints handling process;
- Complaints are investigated impartially with a balanced view of all information or evidence,
- We take responsible steps to actively protect personal information,
- Complaints are considered on their merits taking into account individual circumstances and needs.

The present Complaints Handling Policy (the “**Policy**”) is designed to ensure compliance with the following rules and regulations:

- CSSF Regulation 10-04 of 22 December 2010;
- CSSF Regulation 16-07 of 26 October 2016 (which cancels and replaces CSSF Regulation 13-02 of 15 October 2013);
- CSSF Circular 17/671 (as amended by Circular CSSF 18/698) of 13 October 2017 (which cancels and replaces CSSF Circular 14/589 of 27 June 2014);
- CSSF Circular 18/698 of 23 August 2018;

2. Definition

For the purpose of the Policy, the following terms mean:

Abbreviation	Definition
CSSF	Commission de Surveillance du Secteur Financier, the Luxembourg financial supervisory authority
Complaint Handling Officer	The person responsible for the Complaints handling at the level of the Senior Management of Calligo, i.e. Jason Petrucci
Client	A company that procures services from the Company

Complaint	Any complaint filed against the Company by a Client because of its capacity as a Client and solely in relation with and within the limits of such capacity as a Client, in order to have a right of the Client towards the Company be recognized or to have a prejudice suffered by the Client because of an action or because of the absence of an action of the Company, respectively of its Delegate(s), be rectified
Complainant	Client or persons filing a Complaint with Calligo

3. Complaints handling officer and internal control mechanisms

3.1. Complaints Handling Officer

Within the framework of the functioning Senior Management team, Mr Jason Petrucci is the conducting officer responsible for handling Complaints and claims (“**Complaints Handling Officer**”)

Mr Julian Box is his substitute (“**Substitute**”)

It should be noted that Calligo may delegate the processing of Complaints, under the conditions provided for in section 5.5.5 of CSSF circular 18/698. As of the date of this Policy, Calligo has not delegated this task to a third party.

3.2. Senior Management

The Senior Management of Calligo must record in an adequate and orderly manner the details of its activities and internal organisation. In this context, it ensures that the monitoring of complaints and other claims is included in the “management information”.

At least once a year, the Senior Management team of Calligo presents to the Board of Directors a report detailing the Complaints received by Calligo during the past year, the process for monitoring complaints and resolving complaints, the status of said Complaint and, where appropriate, the remedial measures undertaken or proposed.

3.3. Internal audit function

The internal audit function of Calligo takes into account, when establishing the multi-year audit plan, the handling of Complaints and claims.

3.4. Board of Directors

The Board of Directors receives at least annually a report detailing the Complaints received by Calligo during the past year, their treatment and, if applicable, the remedial measures undertaken or proposed.

4. How to file a complaint

The Complaint must be submitted in the Luxembourgish, English or French language:

- By email to complaints@calligo.lu
- By mail to the following address:
Calligo (Luxembourg) PSF S.A
Complaints Handling Officer

7 rue des Mérovingiens
Bourmicht
L-8070 Bertrange
Luxembourg

5. Required information and documents when filing a complaint

The Complaint must be substantiated and accompanied by the following documents:

- A detailed and chronological statement of the facts giving rise to the Complaint
- The Complainant's declaration certifying that he/she has not seized a court, an arbitrator or another body for the out-of-court settlement of claims in Luxembourg or abroad
- In the event that a person acts on behalf and in the name of the Complainant, a document attesting to his/her power of representation
- A copy of the Complainant's identity document and, if applicable, that of his/her representative

Calligo reserves the right to request the production of any other document or information it deems necessary for the investigation of the Complaint.

6. Acknowledgement and handling of complaint

Any Complaint received by Calligo is stamped on the day it is received using a time stamp and sent to the Complaints Handling Officer or the Substitute. However, Complaints received by e-mail will not be time-stamped insofar as the date of receipt as mentioned on the e-mail is valid.

Upon receipt of the Complaint, the Complaints Handling Officer, the Substitute or any other member of Calligo staff appointed for this purpose:

- checks that the elements and documents mentioned in section 5 of the Policy have been sent by the Complainant in one of the languages mentioned in section 4 of the Policy;
- assess whether other documents or additional information are, if applicable, necessary for the investigation of the Complaint;
- analyses:
 - data relating to the processing of the Complaint in order to assess its seriousness, identify and deal with any significant, systemic or recurring problem that requires a specific action plan that exceeds the framework of the Complaint in question and the one of the Policy;
 - legal and operational risks;
- considers to the extent possible the reasonable time for sending an appropriate response to the Complainant;
- sends the Complainant, within 10 working days of receipt of the Complaint, an acknowledgment of receipt, unless a detailed response can be provided within this period. This acknowledgment of receipt contains:
 - information on the Complaints handling procedure;
 - the full contact details of the person handling the Complaint;
 - the reasonable response time and;

- where applicable, the commitment of Calligo to resort to the out-of-court Complaint handling procedure.

If the Complaint is not eligible under this Policy, the Complaints Handling Officer or the Substitute shall inform the Complainant, within 10 working days of receipt of the Complaint, and indicate to him/her where applicable, the person or entity concerned;

- seeks to collect and examine all relevant evidence and information concerning the Complaint;
- defines an action plan in order to provide an adequate response to the Complainant;
- ensures that the Complainant receives an appropriate response within a reasonable period of time, without however this period being able to exceed one month from receipt of the Complaint in question, except in exceptional circumstances which will be expressly justified;
- ensures that said response is written in simple and understandable language on the basis of clear, precise and up-to-date information and that it includes:
 - information to the Complainant that he has the possibility to submit, if he is not satisfied with the response given to him/her by the Complaints Handling Officer, a request for review of his/her complaint to the Senior Management of Calligo and, where applicable, a complaint request to the CSSF, within one year of the date on which he/she lodged his/her complaint with Calligo and in accordance with the terms of the CSSF Regulation 16-07 of 26 October 2016 relating to the out-of-court resolution of complaints;
 - a copy of said CSSF regulation;
- updates Calligo's Complaints Register and indicates the status of the complaint in question.

During the Complaint handling process, the Complainant has the right to inquire with the Complaints Handling Officer about the status of his/her Complaint.

7. Status of Complaint

The Complaints Handling Officer has defined the following status of a complaint:

Status	Description
Pending acknowledgement of receipt	a complaint has been received by Calligo; but an acknowledgement of receipt has not yet been sent to the complainant
Pending response	a complaint has been received by Calligo and an acknowledgement of receipt has been sent to the complainant; but an adequate response has not already been communicated
Response provided	a complaint has been received by Calligo and an adequate response has been sent to the complainant
Open	any complaint non classified as "Closed"
Closed	Any complaint for which Calligo has sent an adequate response to the complainant: <ul style="list-style-type: none"> ○ and for which Calligo has received from the complainant a formal acceptance or formal cancellation of the complaint; or

	<ul style="list-style-type: none"> ○ which remained un-commented by the complainant within a period of one (1) year following the date when the response was sent by the Company or, as the case may be, by a Delegate to the Complainant
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Depending on the circumstances, a complaint classified as “Closed” can be reactivated and classified again with an “Open” status.

The Complaints Handling Officer ensures that all complaints that are classified as “Open” are followed.

8. Conflict of Interest

As part of the complaints handling process, Calligo, its Board of Directors, its Senior Management, the Complaints Handling Officer, the Substitute as well as the members of its staff ensure that they comply with the conflict of interest policy of the Company.

9. Recording of Complaints

The Complaints Handling Officer or his Substitute records each Complaint received in a Complaints Register established in electronic format as well as all correspondence received and sent in this context.

All original documents are also kept at the registered office of Calligo.

The Complaints Register contains at least the following information:

- the identity of the Complainant;
- the date of receipt of the Complaint;
- the identification number assigned to the Complaint;
- the nature of the Complaint;
- where applicable, the identity of the third-party service provider that is best able to respond to the Complaint;
- the nature of the response to the Complainant and the action to be taken;
- the date of the response to the Complainant;
- the status of the Complaint

10. Reporting to the CSSF

The Complaint Handling Officer provides the CSSF, on an annual basis at the latest within five months following the end of the financial year of Calligo, with:

- a table including the number of Complaints recorded, classified by type of Complaints, as well as a summary report of the Complaints and of the measures to be taken to handle them;
- if applicable, the list of third parties authorized to deal with Complaints.

It is recalled that the summary Complaints report does not consist of a compilation of summaries of Complaints but must in any case present the recurrent problems encountered by Calligo, and must contain, if necessary, a report of the measures that have been taken to deal with said Complaints. This summary Complaints report can be integrated into the annual summary report of the compliance function.

The Company will also ensure to notify the CSSF in the event of a change in the delegation of Complaints handling and in the event of a change of Complaints Handling Officer.

The annual reports of Complaints and other communications exchanged on this subject with the CSSF are stored at the registered office of Calligo.

11. Remedial Actions

The Complaints Handling Officer, respectively its Substitute, analyzes each Complaint to identify, if necessary, causes common to certain types of Complaints and to identify any improvements to be made to the functioning and organization of Calligo and third-party providers to whom Calligo has delegated certain functions under its responsibility.

In this context, the Complaints Handling Officer, respectively its Substitute:

- analyzes the causes of individual Complaints in order to identify the origins common to certain types of Complaints;
- examines whether these origins can also affect other processes or products, including those to which the Complaints do not relate directly; and
- corrects these origins when it is reasonable to do so.

12. Filing a complaint with the CSSF

Insofar as Calligo is subject to the prudential supervision of the CSSF, the latter is competent to receive complaints from Calligo's Client and to act as conciliator in order to find an amicable settlement of the complaints in question.

When the CSSF comes to the conclusion that the Complainant's request is wholly or partly justified, it invites the parties to contact each other to settle their dispute in view of the reasoned conclusion and to communicate the follow-up to it. When the CSSF comes to the conclusion that the positions are irreconcilable or non-verifiable, it will inform the parties in writing.

It should be noted that the opinion of the CSSF is not binding on either the Complainant or Calligo, that remain free to accept or refuse the conclusions issued by the CSSF. The CSSF will also inform the Complainant and Calligo of the possibility of seizing the courts and tribunals, in particular if they do not reach an agreement following the issue of the conclusions motivated by the CSSF.

The Complaints Handling Officer also ensures that the CSSF is informed, in accordance with the latter's request in its reasoned conclusion and within the time limit set in its letter, if Calligo has decided to accept, refuse or follow the solution proposed by the CSSF.

Communications exchanged with the CSSF are kept at the registered office of Calligo.