



Bamboo Capital Partners S.A. – Complaints Handling Policy

BAMBOO CAPITAL PARTNERS S.A.

Complaints Handling Policy

(the “Policy”)

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1. Glossary

Term	Description
AIF/Funds	Alternative investment fund, within the meaning of the AIFM Law, managed by the AIFM/BCP
Board	Board of Directors of BCP
Complainant	Client filing a Complaint
Complaints Handling Officer	Xavier Sabatier, conducting officer/senior manager in charge of the Risk and Compliance Function
Conflict(s) of Interest	Situation where different parties have interests that might conflict with each other. Such conflicts may arise where between different functions and/or units of BCP but also between different functions, units and/or companies of the Group it belongs to (including Group employees and tied agents, or any person directly or indirectly linked to them by control) and BCP, as well as between one AIF or Investor and another AIF or Investor
CRD	Capital Requirements Directives
CSSF	<i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg supervisory authority of the financial sector
Director(s)	Member(s) of the Board of BCP
ESMA	European Securities and markets Authority
Funds	AIFs managed by BCP
Management Company	Bamboo Capital Partners (“BCP”, “Bamboo”)
MiFID	Markets in Financial Instruments Directive
Policy	This Complaints Handling Policy
Senior Management	Persons who effectively conduct the business of BCP within the meaning of Article 102(1)(c) of the 2010 Law and Article 7(1)(c) of the 2013 Law (“conducting officers”)
Senior Management/Conducting Officer(s)	<ul style="list-style-type: none"> • Senior Management of BCP • Officer(s) appointed by BCP and fulfilling one or several of management functions as required under the AIFM Law
UCITS	Undertakings for Collective Investment in Transferable Securities

2. Applicable regulations

Term	Description
AIFMD	Directive 2011/61/EU of 8 June 2011 on alternative investment fund managers
AIFM Law	The Luxembourg law of the 12 July 2013 on alternative investment fund managers, as amended
Circular 17/671	Specifications regarding CSSF Regulation N° 16-07 of 26 October 2016 relating to out-of-court complaint resolution
Circular 18/698	CSSF circular on the authorization and organization of investment fund managers incorporated under Luxembourg law and on specific provisions on the fight against money laundering and terrorist financing applicable to investment fund managers and entities carrying out the activity of registrar agent.
CSSF Regulation N° 10-04	Regulation regarding organisational requirements, conflicts of interest, conduct of business, risk management and content of the agreement between a depositary and a management company
CSSF Regulation N° 16-07	Règlement relatif à la résolution extrajudiciaire des réclamations

3. Definition

In the Guidelines on Complaints-Handling for the Securities and Banking Sectors, the ESMA has defined a complaint as “A statement of dissatisfaction addressed to a firm by a natural or legal person relating to the provision of (i) an investment service provided under MiFID, the UCITS Directive or the AIFMD; or (ii) a banking service listed in Annex I to the CRD; or (iii) a service of collective portfolio management under the UCITS Directive...”

As stated in the CSSF Regulation N° 16-07 relating to out-of-court complaint resolution, a complaint is judged as not admissible in the following cases:

- the complaint has been previously or is currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad;
- the complaint concerns the business policy of the professional;
- the complaint concerns a non-financial product or service;
- the request is unreasonable, frivolous or vexatious;
- the complaint has not been previously submitted to the relevant professional in accordance with Article 5(1) of this regulation;

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- the complainant has not filed a request with the CSSF within one year after s/he filed a request with the professional.
- the request handling would seriously impair the efficient functioning of the CSSF.

4. Purpose of the Policy

The Policy describes the effective and transparent procedures for the fair handling of complaints as well as the record of complaints which are made available to the CSSF upon request. The Policy is available on the web site of BCP.

5. Complaints Handling Officer

Mr. Xavier Sabatier is the conducting officer responsible of the Risk and Compliance Function. He is also responsible for handling complaints and claims.

Under the conditions provided for in section 5.5.5. of the CSSF circular 18/698, BCP may delegate the processing of complaints. As of the date of the Policy, BCP has not delegated this task to a third party.

6. Complaints Handling Procedure

All verbal and/or written complaints received directly or via a third party by BCP, have to be communicated directly to the Complaints Handling Officer, which shall treat a complaint as follows:

- Ensure that the complaint is acknowledged in writing to the complainant within 48 hours of receipt and, in any event, within no more than ten working days of receipt, unless the response itself is provided to the complainant within this period.
- Ensure that the complainant is informed of the name and contact details of the person in charge of the complaint and, where applicable, the contact details of any other person for escalation purposes within BCP.
- Ensure that the complainant is informed, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure at the CSSF¹.
- Provide a final written response to the complainant either by letter or electronic mail regarding the resolution of the complaint as soon as practicable and in any event no later than one month from the date of the receipt of the original complaint. The response should mainly contain the outcome of the investigation as well as a clear explanation as to why the complaint has been upheld or rejected as the case may be.

¹ https://www.cssf.lu/wp-content/uploads/RCSSF_No16-07eng.pdf

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In this context, any complaint must be sent to:

Xavier Sabatier
Bamboo Capital Partners S.A.
5, Place de la Gare
L-1616 Luxembourg
Email address: complaint@bamboocp.com

Where a complainant did not receive a response or satisfactory response within one month of a complaint being submitted to Bamboo Capital Partners S.A., the complainant can refer their complaint to the CSSF within one year of the date of filing with BCP. In the event of submitting a complaint to the CSSF it should be submitted in the English, Luxembourgish, German, or French languages by the following means:

- By mail addressed to the Commission de Surveillance du Secteur Financier, 283, route d’Arlon, L-2991 Luxembourg
- By email at reclamation@cssf.lu.

7. Minimum information when filing a complaint

The complaint must be accompanied by the following documents:

- Copy of the complainant's identity document and, if applicable, that of his representative. 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;
- Detailed description of the facts giving rise to the complaint;
- Declaration by the complainant that he/she has not applied to a court, arbitrator or other out-of-court dispute settlement body in Luxembourg or abroad.

8. Remedial actions

The Complaints Handling Officer treats the complaint as follow:

- Analyze the causes of individual complaints to identify common origins for certain types of complaints.
- Examines whether these origins may also affect other processes.
- Correct these origins where it is reasonable to do so.

9. Reporting to the CSSF

The Complaints Handling Officer shall provide the CSSF, on an annual basis and at the latest within five

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months following the BCP's financial year-end, with the following information:

- a table including the number of complaints registered;
- a summary report of complaints and actions taken to address them;
- where applicable, a list of third parties authorized to handle complaints.

In case of modification of the delegation of the handling of complaints and/or in case of change of the Complaints Handling Officer, the CSSF will be notified.

10. Update of the Policy

The Policy will be amended to reflect organizational changes in BCP or if there are significant changes in the regulatory framework for handling complaints. Regardless of these specific circumstances, the Policy will be reviewed at least annually.

Number	Date	Comment	Approval
1	05/05/2018	Initial version from the Risk and Compliance Manual	
2	25/06/2024	New separate document and update 18/698	Approved by the Senior Managers