

Complaint handling Policy

Robeco Luxembourg S.A.

Document information

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Complaint handling Policy

1. Introduction

Robeco Luxembourg always acts in the best interests of its clients. Customer complaints can be an important indication of the quality of the services and products provided by Robeco Luxembourg.

2. Scope

This policy is based on CSSF Circular 17/671 as amended by Circular CSSF 18/698 and CSSF Regulation N° 16-07. The policy only applies to complaints directly received by Robeco Luxembourg.

3. Aim of this procedure

The aim of this policy is to establish the minimum requirements for the proper handling of all complaints received by Robeco Luxembourg.

4. Definitions

Complaint:

A written statement made by investors or their authorized representatives expressing their annoyance, dissatisfaction, grievance or concern about services or products managed by Robeco Luxembourg.

Person responsible for complaints handling:

The person responsible for the handling of and the follow up on complaints, designated by the Board of Directors of Robeco Luxembourg.

Robeco Luxembourg

The management company Robeco Luxembourg S.A.

5. Procedure

a. Register of complaints

Complaints received by Robeco Luxembourg with regard to Robeco Luxembourg products or services are reported to the Person responsible for complaints handling. Complaints are registered in the Rolux Complaints register.

b. Handling of complaints

After registering the complaint the Person responsible for complaints handling determines how and with whom he will handle the complaint. The written acknowledgement of receipt will be sent within ten business days after receipt to the complainant and include the name and contact details of the Person responsible for complaints handling.

The follow-up as well as all relevant documentation will be registered. The complaint will be handled within one month from the date on which the complaint was received.

If the complaint is not settled to the satisfaction of the complainant, the complainant has the possibility to escalate to the Board of Directors of Robeco Luxembourg.

Where the complaint handling did not result in a satisfactory answer for the complainant, the Person responsible for complaints handling shall provide the complainant a full explanation and inform the complainant in writing on the existence of the out-of-court complaint resolution procedure at the CSSF and refer the complainant to the CSSF website.

External service providers may assist in the handling of complaints. Contractual arrangements are in place with Robeco Institutional Asset Management B.V. and J.P. Morgan Bank Luxembourg S.A. under which these may do so. This arrangement takes into account that relevant complaints may be received by these parties in the course of their interaction with investors.

c. Reporting of complaints

An overview of the registered complaints is reported to the Board of Directors of Robeco Luxembourg on a quarterly basis. If necessary the complaints are discussed with management to analyze their causes and institute process improvements.

On an annual basis a report indicating the number of complaints, the reason for the complaints and the progress made in the handling is sent to CSSF within five months from the year end.

The complaint handling procedure is published on the website www.robeco.com/luxembourg.