



Complaints handling policy

Reference Procedures Manual: # 7	
Creation: 11/06/2019	Updates: 21/04/2023 (v.2) <u>22/03/2024 (v.3)</u>
Procedure manager: Chief compliance officer (RCCI)	
Responsible for the validation of the procedure: Executive Board	

Update

Updates to this policy are initiated by the Managing Partners, the Investment Relation team and/or the Chief compliance officer.

All updates must be validated by the Chief compliance officer.

In the event of an update, a new version of the procedure is issued.

Update table

Nature of the update	Update
English translation of the policy (previously in French) and reviewing the policy in line with AMF Instruction DOC 2012-07 update	22/03/2024

Summary

This policy sets out the rules applicable to all Argos employees who are aware of a complaint. The main employees concerned are those who have direct links with our investors, in particular the Investors Relations team, Partners, and back-office teams.

Regulatory framework

Article 318-10 of RGAMF

The asset management company shall establish and maintain operational an effective and transparent procedure for reasonable and prompt handling of complaints received from:

1. All holders of units or shares in AIFs, when no investment service is provided to them upon subscription;
2. Holders of units or shares in AIFs, from non-professional clients when an investment service is provided to them by the asset management company upon subscription.

The persons referred to in 1 and 2 may file complaints free of charge with the asset management company.

They shall implement a system enabling fair and consistent handling of complaints from the persons referred to in 1 and 2. This system shall be allocated the necessary resources and expertise.

It shall record each complaint and the measures taken to handle it. It shall also implement a complaint monitoring system, enabling it to identify problems and implement appropriate corrective measures.

Information on the complaint handling procedure shall be made available free of charge to the persons referred to in 1 and 2.

The complaint handling procedure shall be proportionate to the size and structure of the asset management company.

AMF (Autorité des Marchés Financiers) Instruction DOC 2012-07

The AMF clarifies the rules that investment services providers, financial investment advisers, crowdfunding investment advisers, real-estate investment trust management companies and issuers must comply with in their complaint handling. The instruction details the information to be given to the client about the complaint handling system, the procedures to be implemented to guarantee efficient, fair and harmonised handling, and a system for tracking these procedures to identify and remedy malfunctions.

Scope and framework

A complaint is a statement received by any traceable means of dissatisfaction made by the customer towards the professional to whom it is addressed. It can be made by any person with an interest in the matter even in the absence of a contractual relationship with the professional: customers, former customers, holders of financial securities, persons who have requested a product or service from the professional or who have been solicited by a professional, including their agents and assigns.

Simple requests for information from customers fall outside the scope of this policy but are handled by operational staff using a similar process.

Consequently, any request for information or corrections is not considered a complaint.

A claim may take the form of:

- A simple letter of complaint (including an e-mail);
- A phone call;
- A formal notice received from the plaintiff's legal counsel;
- A visit by a bailiff on the basis of a request or summons;
- A visit from a judicial or administrative authority;

Customer complaints are sent to Argos Wityu free of charge. No charges may be applied to clients for handling complaints.

Implementation of claim handling process

Receiving a complaint

Argos employees must identify letters, telephone calls and e-mails that constitute complaints and define the correct channels for handling them.

All complaints are dealt with, including those from customers residing in another Member State of the European Union. A system has been put in place to ensure that customer complaints are dealt with in an equal and harmonised manner.

Clients may submit a complaint in the official language or one of the official languages of the Member State in which the AIF is marketed. Consequently, they will receive a response from Argos Wityu in the same language.

Complaints should be sent to the following address:

Argos Wityu

For the attention of Mr/Mrs XXXX

112, Avenue de Wagram

75017 PARIS

Argos Wityu has an obligation to:

- Inform investors in clear, understandable language, particularly about the contact details of the people handling complaints requiring a separate processing circuit. At present, the Investors Relations team is the main contact for investors. It should be noted that several teams may be involved in this process.

- Keep investors informed of the progress of their complaint,

The company must acknowledge receipt of the complaint within a maximum of 10 days from the date of dispatch of the written complaint unless a response is provided within this period.

This policy is available on the Argos Wityu website: <https://argos.wityu.fund/fr/>

Detail of the process

The complaints management process must identify:

- Receipt of the complaint;
- Identifying and handling complaints;
- Forwarding the response to the customer and closing the claim.

The complaint is processed by replying to the investor or his representative within two months maximum, except in the case of duly justified special circumstances, from the date of dispatch of the written complaint.

Complaints follow-up

The Chief compliance officer keeps a complaints monitoring register to record all complaints. Depending on the nature of the claim and the degree of seriousness assessed by the chief compliance officer, particularly in terms of major financial and/or reputational risk, he will assess with the operational team whether it is appropriate to include a law firm in the process.

Where appropriate, the complaint enables the chief compliance officer to identify any malfunctions that are the cause of complaints and, where necessary, to implement corrective actions for the future. Details of the work done are then presented in the annual compliance report.

Internal control system

As part of the second-level control, the chief compliance officer ensures that the complaints handling system works properly. It ensures through appropriate monitoring that the procedure in place is effective, in relation to:

- Information provided to investors and the organisation and quality of complaints handling;
- Identification of shortcomings and poor practices in terms of communication and investor protection.

The second level of control is performed annually and formalised in a document. A period report is performed every three years on the quality of permanent controls.

AMF Ombudsman

If Argos Wityu responds unfavourably to a complaint from a customer, the response must include an indication that the customer may appeal to the AMF Ombudsman:

Ombudsman of the Autorité des Marchés Financiers

17, place de la Bourse

75082 Paris Cedex 02

Mail: mediation@amf-france.org

Mediation is a public service provided free of charge in accordance with the law. For more information on this procedure, clients may contact Argos Wityu or consult the AMF website [The AMF Ombudsman | AMF \(amf-france.org\)](#).