

## **COMPLAINT HANDLING POLICY STATEMENT**

### **Introduction**

The purpose of this document is to provide investors with the details on Threestones Capital Management S.A. (the “**Company**”)’s Complaints Handling Policy (the “**Policy**”). The Company has adopted a Complaints Handling Policy in accordance with the applicable Luxembourg laws and regulations. A paper copy of the Company’s Policy is available free of charge upon request.

### **Complaints definition**

For the purpose of the Policy, a complaint is defined in the CSSF Circular N° 16-07 as “an investor claim filed with a professional to recognise a right or to redress a harm”. A complaint is the expression in writing noting the dissatisfaction of an investor, founded or not, with the Company regarding a product or service offered.

Complaints may be filed to the Company in English or French and shall include a detailed description of the situation giving rise to the complaint.

### **Complaints notification procedure**

Investors may file complaints free of charge, either directly with Threestones Capital Management SA or via their usual financial intermediary. The Company is committed to treat clients fairly.

To resolve complaints in an effective and transparent manner, complaints shall be notified in writing to Threestones Capital’s Complaints Handling Officer.

Complaints must be submitted to the Company via email ([tsc\\_compliance@threestonescapital.com](mailto:tsc_compliance@threestonescapital.com)) or in written format the following address :

Threestones Capital Management SA

Complaints Handling Officer

23, rue Aldringen

L-1118 Luxembourg

The complaint must clearly state :

- Name and contact details of the complainant (name, address, phone number, and/or email address);

**Threestones Capital Management** – société anonyme

23, rue Aldringen, L-1118 Luxembourg – Grand Duchy of Luxembourg – R.C.S. Luxembourg B 146773

Threestones Capital Management SA is an Alternative Investment Fund Manager in accordance with the AIFM Directive

[www.threestonescapital.com](http://www.threestonescapital.com)

- An explanation of the complaint.

The Company commits to a prompt, objective and transparent handling of all investor complaints received. As soon as the Company received a complaint, it addresses a written acknowledgement of receipt to the complainant by e-mail or ordinary post within 10 business days after the receipt of the complaint. The acknowledgement will contain the name and contact details of the person in charge of handling the complaint.

When processing an investor complaint, the Company investigates the matter as exhaustively as possible and gathers all relevant evidence and information. The company makes all reasonable efforts to respond to investor complaints within one month of receipt of the complaint. Where an answer cannot be provided within this deadline, the Company informs the complainant of the causes for the delay and indicates an expected response time. At the same time, the Company may provide any other information that may be of assistance to the complainant.

#### **Out-of court provided by the CSSF**

Where the complaints handling process did not result in a satisfactory answer for the complainant, the Company expressly informs the latter on paper or by way of another durable medium of the existence of the out-of-court complaint resolution procedure at the CSSF. In case the Company undertakes to resort to the out-of-court complaint resolution procedure with the CSSF, it shall send the complainant a copy of CSSF Regulation No 16-07 or the relevant reference to the CSSF's website.

The Company shall inform the complainant on paper or by way of another durable medium that he/she can file a request with the CSSF and that, in this case, the request must be filed with the CSSF within one year after the complainant filed the complaint with the Company.

The request must be filed with the CSSF in writing, by post or by fax to the CSSF or by email (to the address/number available on the CSSF website), or online on the CSSF website.

Contact details for the CSSF are available in Regulation 17-06 and on their website: [www.cssf.lu](http://www.cssf.lu).

To facilitate the complaint request, the CSSF provides a specific form on its website: <http://www.cssf.lu/en/consumer/complaints/> The complaint has to be introduced in one of the following languages: Luxembourgish, German, English or French.