

MONOCLE AM	<b>Complaints handling policy</b>	Reference: II - 4 Version: 1.0
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Responsibility	
Person responsible for the procedure	Fantine MONOT
Service	All employees
Relay correspondent	Mimoza BOGESKA

Objective of the procedure
<p>In accordance with the regulations, MONOCLE AM, hereinafter the "Management Company", has set up a complaints handling system specifying :</p> <ul style="list-style-type: none"> <li>• The obligation for MONOCLE AM to respond to the complaint of a client or prospect (hereinafter referred to as the Client) within a maximum period of two (2) months, except in special circumstances that are duly justified. Furthermore, if the response is not provided immediately, MONOCLE AM undertakes to acknowledge receipt within a maximum of ten (10) working days;</li> <li>• The establishment of a complaints handling system to ensure equal and harmonized treatment of complaints;</li> <li>• The obligation to follow up on complaints in order to identify malfunctions and remedy them if necessary.</li> </ul> <p>Management companies that apply the financial regulations stemming from the General Regulation and its implementing instruction may be considered to be in compliance with the provisions of the Consumer Code, provided that they allow all individual consumers to benefit from the complaints handling system, regardless of their status under MiFID.</p>

List of tools/ applications used	
Tools	Dropbox, Microsoft Office
Applications	NA

1st level controls	Archiving (yes/no)	Location
Claims basis	Yes	Dropbox

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<b>Management of procedure updates</b>				
<b>Version</b>	<b>Date</b>	<b>Status</b>	<b>Author</b>	<b>Nature of the changes</b>
1.0	02/12/2020	To be validated	AGAMA Conseil	Creation
1.0	05/02/2021	Validation	MONOCLE AM	Proofreading and validation

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## Summary

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## 1. Scope of application

### 1.1 Perimeter

This procedure is designed to ensure that complaints made to MONOCLE AM by its customers or prospective customers (hereinafter the "Customer(s)") in connection with its activities are dealt with quickly, efficiently and free of charge.

### 1.2 Definition

A complaint is a statement of a Client's dissatisfaction with the professional. The complaint relates to any financial instrument or investment service.

A request for information, advice, clarification, service or benefit is not a claim. Therefore, the following are not considered as complaints

- Specific or overriding marketing information requests;
- Solicitations;
- Service requests;
- Suggestions or proposals ;
- Requests for information or those related to a simple misunderstanding.

### 1.3 Methods of referral to the Management Company

MONOCLE AM has designated the Development Manager as the person responsible for handling customer complaints.

Any Customer wishing to make a complaint to MONOCLE AM is invited to send a letter to the following address

**Monocle Asset Management**  
**15 rue Monsigny**  
**75002 PARIS, France**

A complaint can also be sent to MONOCLE AM by e-mail at: [monocle@monocle.lu](mailto:monocle@monocle.lu)

The customer, in the context of his complaint, must specify clearly and precisely the subject of his complaint. The customer must provide his contact details (postal address and email address) so that MONOCLE AM can contact him and respond to his complaint.

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## 2. Processing the claim

### 2.1 Internal organization

#### Step 1: Opening the file

The employee registers the claim in the complaints database.

- 1) Registration of the claim
- 2) Collection of response elements
- 3) If necessary, sending a letter acknowledging receipt of the complaint (within 10 days).

An acknowledgement of receipt letter shall be sent to the Customer within a maximum of ten (10) working days from receipt of the complaint by MONOCLE AM.

#### Step 2: Response

If the complaint is not covered by the policy, MONOCLE AM shall acknowledge receipt of the complaint.

- 4) Drafting of the response letter
- 5) Internal validation of the response
- 6) Sending the answer to the Customer within a maximum of 2 months.

MONOCLE AM shall be liable for the claim in the event of duly justified special circumstances.

#### Step 3: Follow-up and closure of the file

### 2.2 Claim processing and follow-up

The complaint is followed up until its effective closure.

- 7) Follow-up of the claim until its effective closure
- 8) Update of the reporting
- 9) Archiving and retention

The complaint is followed up until its effective closure. This response is sent to the Customer(s) concerned. This response is sent to the Customer(s) concerned. This response is sent to the Customer(s) concerned. This response is sent to the Customer(s) concerned.

If the incident is the result of a fault committed by an external service provider, a draft response to the service provider in question is also drawn up.

After validation, the response (registered letter or e-mail) is sent to the Customer with acknowledgement of receipt.

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The analysis of the complaints database should enable the Management Company to define and implement corrective measures to improve and correct any internal failings that may be highlighted by the complaints. In particular, the RCCI ensures, as part of its controls, that responses are made within the time limits set.

### 2.3 Recourse to the AMF Ombudsman

MONOCLE AM itself does not have an internal mediation service.

However, if MONOCLE AM rejects the complaint or refuses to grant it in whole or in part, the reply sent to the Customer shall inform him of the possibility of referring the matter to :

- ***The AMF's independent investment services ombudsman.***

Financial Markets Authority  
Ms Marielle Cohen-Branche AMF Ombudsman 17 Place  
de la Bourse 75082 Paris Cedex 02  
75082 Paris Cedex 02

The AMF mediation request form and the mediation charter are available at <https://www.amf-france.org/fr/le-mediateur>

- ***The Insurance Ombudsman for insurance brokerage services or management of unit-linked arbitration mandates.***

La Médiation de l'Assurance  
TSA 50110  
75441 Paris Cedex 09

The mediation request form is available at <http://www.mediation-insurance.org/see+the+mediator>

For services provided in other European Union countries, Switzerland and the United Kingdom, MONOCLE AM informs its Clients of the possibility to refer to the independent ombudsman of the Competent National Authority, the list of which is maintained by the European Commission and accessible via this link: [FIN-NET members](#).

## 3. Customer information

MONOCLE AM informs Customers of its policy on handling complaints, in the places of reception where they exist, or on its website [www.monocle.lu](http://www.monocle.lu).

## 4. Marketing of products and services by a third party

Under the agreements concluded with the distributors of MONOCLE AM's products and services, MONOCLE AM ensures that the information provided to the Client by the distributors is of an equivalent level to that provided to its own Clients.

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The distribution agreements concluded by MONOCLE AM include a clause relating to the handling of complaints. This clause aims to ensure that distributors :

- Have implemented a complaint handling system in accordance with the regulations (particularly with regard to the time taken to reply to the Customer);
- MONOCLE AM receives complaints about its products or services.

## **5. Use of a lawyer / recording of a provision**

In the context of a simple response or a more important dispute, MONOCLE AM may seek the assistance of a lawyer with the prior agreement of the directors.

The decision whether or not to record an accounting provision, in relation to the costs incurred by the dispute or the amount of any associated compensation, is made by the Management Company's General Management, based on its assessment of the risk.

## **6. Recording of complaints and actions taken**

The documents relating to the claim must be kept for 5 years from the date of receipt of the claim. They are stored in the MONOCLE AM Dropbox.

## **7. Monitoring and control**

The SGP's Compliance Officer monitors the processing of complaints on an ongoing basis.

The RCCI or its delegate, AGAMA Conseil, shall formalize a control at least once a year on the proper application of the rules for handling complaints as set out in this procedure.

Annually, the RCCI reports to the AMF, within the framework of the FRA/RAC :

- Information on the complaints handling system in place within the Management Company;
- The number of claims received ;
- The amounts of compensation paid during the period following claims.