

COMPLAINTS HANDLING POLICY

Reference:	Complaints Handling Policy
Version number:	1.2
Status:	Final
Risk owner:	Chief Executive Officer

ACTIAM N.V.
Utrecht, March 2019



Title	<i>ACTIAM Complaints Handling Policy</i>
Version	<i>1.2</i>
Effective Date	<i>19 March 2019</i>
Owner	<i>ACTIAM Chief Executive Officer</i>
Manager	<i>Manager Legal & Compliance</i>
Consultation	<i>ACTIAM Institutional Client Group</i>
Approver	<i>RMC - ORC MT AM</i>



Version

Version	Date	Changes
1.0	21-12-2017	New MiFID II Complain Handling Policy
1.1	28-03-2018	Update to adapt terminology to new organogram ACTIAM and minor changes to the layout
1.2	18-03-2019	

Approval

Version	Date	Adopted by
1.0	04-01-2018	RMC - ORC MT AM
1.2	19-3-2019	RMC - ORC MT AM



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1 Executive Summary

This Policy explains the complaints procedures that ACTIAM has put in place for the purposes of the handling of complaints introduced by the revised Markets in Financial Instruments Directive 2014/65/EU dated May 15 2014 (“**MiFID2**”) as implemented in Financial Supervision Act (*Wet op het financieel toezicht* and the “FSA”) and the MiFID2 Delegated Directive 2398 dated 7 April 2016 (the “**Delegated Directive**”).

ACTIAM is an Alternative Investment Fund Manager (“**AIFM**”) licensed by the Authority for the Financial Markets - AFM. Based on its license it is also allowed to provide certain ‘MiFID services’, being: portfolio management, investment advice and reception and transmission of orders. In principle the MiFID2 complaints rules regime only applies to ACTIAM when it provides these ‘MiFID services’ and does not apply when ACTIAM acts as the AIFM for any of the Alternative Investment Funds (“**AIFs**”) managed by it. This Complaints Handling Policy only applies in relation to the MiFID services of ACTIAM.

1.1 Rationale

Regulatory objectives: For the purposes of constructing this Policy, ACTIAM has considered the following legal and regulatory sources and guidance including Articles 16(2) MiFID2 and 4:17 FSA, Article 26 of the MiFID2 Delegated Directive and applicable guidelines in relation to complaints handling.

1.2 Scope

Entity scope: This Complaints Handling Policy applies to ACTIAM N.V. (“**ACTIAM**”).

Business/product lines: All business lines of ACTIAM involved in providing MiFID Services. For the purpose of this policy in particular ACTIAM Business Development.

Service Scope: This Policy applies to all MiFID services’, being: portfolio management, investment advice and reception and transmission of orders (the “**MiFID Services**”).

Client scope: This Policy applies to Products sold to all types of end-clients, including professional clients, regardless of whether they are per se or elective professional clients, and potential end-clients or firms. That is to say it applies to end clients who are categorized as retail, professional or eligible counterparty clients under MiFID2.

Jurisdictional scope: This Policy applies when ACTIAM carries out MiFID Services wherever the end client is based. ACTIAM will adopt a proportionate approach and will take into account different regulatory systems across EU jurisdictions or non-EU jurisdictions.

Complaint: A statement of dissatisfaction addressed to a firm by a client or a potential client relating to the provision of Services.

2 Complaints process

2.1 Receipt, Investigation and Response

Clients, and potential clients, can submit complaints to ACTIAM free of charge. In the general course of business, complaints are likely to be received directly by ACTIAM Portfolio Management, ACTIAM

Business Development or the Board of Directors of ACTIAM. However, this does not prevent complaints being received in any other part of our business. If so, make sure the complaint will be passed on to ACTIAM Business Development (ClientServices@actiam.nl) or direct the complaint in writing for the attention of ACTIAM Business Development at the address as provided below.

When an employee of ACTIAM receives a complaint, this employee will perform the following:

- Record the complaint in a complaint form, describing nature of the complaint, making a summary of the complaint provided in English, including all relevant documentation. If there is any doubt if it concerns a complaint, the Compliance Function of ACTIAM is consulted.
- Report the complaint to Board of Directors of ACTIAM, ACTIAM Risk Management, ACTIAM Legal & Compliance. The Compliance Function of ACTIAM will analyze complaints and complaints handling data to ensure that they identify and address any issues.
- Communicate within 2 days to the client that the complaint has been received and will be dealt with.
- Report to the Board Directors of ACTIAM, ACTIAM Risk Management, ACTIAM Legal & Compliance regarding the approach or outcome of the investigation of the complaint and the way it should be dealt with and responded to. If necessary according to the nature of the complaint, the Compliance Function of ACTIAM will be appointed as complaint coordinator.
- Report back to client within 5 working days and, if necessary, provide further timelines to the client for dealing with the complaint, taking in to account that the response to the complaint will be provided without any unnecessary delay.
- ACTIAM will explain to the client or potential client the firm's position on the complaint and set out the client's options, where relevant, to refer to an alternative dispute resolution entity, or for the client to take civil action.

2.2 Complaints Reporting

The Compliance Function will record the complaints in the quarterly Risk & Compliance report.

ACTIAM shall provide information on complaints and complaints-handling, to the extent requested or mandatory, to the relevant competent authority and, where applicable under national law, to an alternative dispute resolution entity.

2.3 Record Retention

ACTIAM shall keep a record of the complaint received and the measures taken for their resolution, which will be retained for five years, and on request of the supervisory authority, for seven years.

2.4 Policy Adherence Monitoring

The Compliance Function will be responsible for monitoring and reviewing this Complaints Handling Policy.

2.5 Update Requirements

The Complaints Handling Policy will be reviewed and approved annually.

2.6 Address of ACTIAM for filing the Complaint

<p>Visiting address:</p> <p>ACTIAM</p> <p>Graadt van Roggenweg 250</p> <p>3531 AH Utrecht</p> <p>Telephone (+31) (0)20 54 36 777</p>	<p>Postal address:</p> <p>ACTIAM N.V.,</p> <p>For the attention of ACTIAM Business Development</p> <p>PO Box 679</p> <p>3500 AR Utrecht</p> <p>E-mail: ClientServices@actiam.nl</p> <p>General affairs: (+31) (0)20 54 36 543</p>
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