



# Customer Complaints Handling Procedure



**March 2024**

| Version | Date    | Description  | Author |
|---------|---------|--|--------|
| 1.0     | 01-2013 | Creation of policy   | IRML   |
| 1.1     | 12-2014 | Update of policy with regard to:<br><ul style="list-style-type: none"> <li>▶ CSSF Regulation 13-02</li> <li>▶ CSSF Circular 14/589</li> </ul>  |        |
| 1.2     | 10/2017 | Annual review and update (CSSF Regulation 16-07, etc.)   | Arkus  |
| 1.3     | 12/2018 | Annual Review<br><ul style="list-style-type: none"> <li>▶ Changes in respect of discontinued use of Salesforce.</li> <li>▶ Appendix 1 – Complaints Form</li> </ul>                                     | Arkus  |
| 1.4     | 12/2019 | Annual Review<br><ul style="list-style-type: none"> <li>▶ Change of Complaints Handling Officer</li> </ul>   | Arkus  |
| 1.5     | 11/2020 | Annual Review  | Arkus  |
| 1.6     | 01/2022 | Annual Review<br><ul style="list-style-type: none"> <li>▶ Change of registered seat</li> <li>▶ Restitution of license under Art. 28-10 LFS</li> <li>▶ Change of Complaints Handling Officer</li> </ul> | Arkus  |
| 1.7     | 07/2023 | Annual Review<br><ul style="list-style-type: none"> <li>▶ IRML name change</li> </ul>  | Arkus  |

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| 1.8   | 03/2024 | Annual Review<br>▶ Withdrawal of PFS license | Arkus |
| <b>Owner of this document:</b> Compliance Officer |         |  |       |

## Preamble

Arkus Financial Services ("Arkus") having its registered office at 5, rue Gabriel Lippmann, L-5365 Munsbach, Grand Duchy of Luxembourg is organized as a Limited Company (*société anonyme*). Arkus was incorporated on the 6 of September 2007 and was authorized by the *Commission de Surveillance du Secteur Financier* ("CSSF") as "Professionnel du Secteur Financier" ("PSF"), articles 29-1 and 29-2 of the law of 5 April 1993 on the financial sector, as amended ("Law 1993").

Further to a strategic decision to focus on the provision of risk reporting services, it has been agreed with the CSSF to withdraw the licenses as support PSF under articles 29-1 and 29-2 of the Law 1993 as of March 14, 2024.

This document details the customers complaints handling procedure (the "Procedure") applied by Arkus.

### I. Definition of a complaint

Any expression of dissatisfaction by a customer or potential customer about service delivery, the standard of service, actions or lack of action by the company or its agents, affecting the customer or potential customer. The complaint is to be distinguished from a request for service; however a request for service may develop into a complaint where the provision or timeliness of the service is considered unsatisfactory.

The complaint is a formal statement usually received in writing, by e-mail or by informal means to the Company staff and may require a senior level of involvement to resolve the matter. All complaints will be regarded seriously and will be dealt with in the shortest possible time, and every endeavor will be made to resolve complaints satisfactorily.

### II. The Complaints Handling Officer

According to the legal provisions, the Board of Directors is responsible for the implementation of a company's policy related to customer complaint handling Andrea BREVI, Conducting Officer of the Company, is in charge of the customer complaint handling ("the Complaints Handling Officer") and as such responsible for the handling, centralization and follow-up of customer's complaints.

The Complaints Handling Officer is responsible for dealing with complaints fairly and promptly. If the complaint is addressed against the Complaints Handling Officer, then it is directly submitted to the Board of Directors.

### II. Procedure for Handling the Complaint

#### 1. Client communication record

The employee receiving a client complaint shall complete a "Complaints Form" in case of any signs of dissatisfaction or in case of request for services, the employee shall inform his/her senior officer and the Complaints Handling Officer with no delay. The employee will then log the communication by way of a file note saved into the relevant client sub-folder on network "S:\11-Central Administration - Arkus FS\1. Clients" and attach any related call reports, notes or emails.

## 2. Processing of a complaint

Upon receipt of the Complaint, the employee receiving the request shall:

- a) Inform the Complaints Handling Officer as soon as possible;
- b) Complete a "Complaints Form" and save a copy to "S:\11- Central Administration - Arkus FS\1. Clients\1. Client Complaints"
- c) The Complaints Handling Officer will send to the complainant a verbal or written acknowledgment within 5 working days of receipt of the complaint and a copy will be attached to the network drive for the client as well as to S:\11- Central Administration - Arkus FS\1. Clients\1. Client Complaints;
- d) The Complaints Handling Officer will investigate and determine the remedial action to be taken and the response to give to the client and make contact with the complainant to inform them of the investigation outcome and, if required, further actions taken;
- e) The Complaints Handling Officer will update the "Complaint Forms" with the remedial action taken and the response given to the client a copy of the letter or email confirming this remedial action will be uploaded the relevant client drive and to S:\11- Central Administration - Arkus FS\1. Clients\1. Client Complaints.
- f) A hardcopy of all completed "Complaints Forms" are then provided to the Compliance Officer for retention in a central file.

Any response to a client's complaint should be written on a letterhead, if possible sent by email as well, and in any case, scanned and saved on the Company's server.

In case the response solves the complaint, no further action is necessary.

In all responses, the Complaints Handling Officer shall explain to the complainant how the complaint was assessed. If the Company decides that remedial action is appropriate in regards to the complaint, the response will detail how the Company will action the remedies.

Where the complainant did not receive a satisfactory answer from the Company, the Complaints Handling Officer will provide the client with a full explanation of the Company's position.

All client complaints are be reviewed during the monthly Executive Committee and presented to the Board of Directors at the Arkus Financial Services Board meetings held on a quarterly basis.

In case of a legal action , the case will be directly addressed by the Board of Directors.

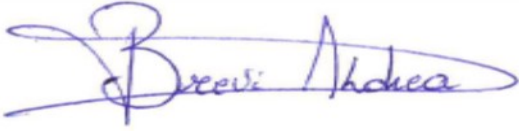
### **III. Data protection and professional secrecy**

The Company and any of its employee, officer, manager or director shall always comply with Luxembourg laws or regulations relating to data protection and professional secrecy. Any act of investigation and any communication shall always comply with these laws and regulations.

### **IV. Availability of the procedure**

This Procedure is freely available at the registered office of the Company. The procedure shall be made available to all relevant staff.

Arkus Financial Services



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Andrea BREVI  
Conducting Officer and Complaints Handling Officer  
Date:



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Martin EWEN  
Chief Risk Officer  
Date:

**ARKUS FINANCIAL SERVICES**

**CLIENT COMPLAINTS FORM**

Client Name:

Date complaint received:

Compliant received by (employee name):

Received by: Email / Letter *\*delete where applicable*

Nature & Detail of Complaint:

Date complaint form provided to Complaints Handling Officer:

Date acknowledgement of complaint sent to Client by Complaints Handling Officer:

*\* due within 5 working days*

Remedial Action / Response to client

Date complaint formally resolved & closed:

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Signed by Complaints Handling Officer

Dated: