

NIKKO ASSET MANAGEMENT LUXEMBOURG S.A.

COMPLAINTS HANDLING POLICY

May 2019

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Nikko Asset Management Luxembourg S.A.

Société Anonyme

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Authorised and Regulated by the Commission de Surveillance du Secteur Financier

Number S00000717

Nikko Asset Management Luxembourg S.A.

Complaints Handling Policy

This document is designed to explain to investors how to make a complaint and to clarify the handling of these complaints.

Nikko Asset Management Luxembourg S.A. ("NAML") operates a complaints procedure that aims to handle all complaints fairly, promptly and consistently.

Introduction

To comply with the applicable laws and regulations, NAML will record and treat all complaints in a careful and prompt manner. Complainants will be able to file a complaint without charges, and this complaints policy shall be freely made available to them upon request.

The objective of this complaints handling policy is to describe how NAML will:

- deal with investor complaints in a prompt, efficient, and appropriate manner;
- meet the regulatory obligations mentioned below; and,
- ensure that systematic and recurring problems are identified and rectified.

NAML has appointed Mr. Hervé Podevyn to be the person on management level being responsible for complaints ('Complaints Handling Officer').

The followings are the relevant laws and regulations:

- CSSF Regulation 16-07 relating to the out-of-court resolution of complaints
- CSSF Regulation 10-04
- CSSF Circular 18/698
- CSSF Circular 17/671
- The Law of 10 December 2010 relating to undertakings for collective investment

Complaints

A complaint can be made by an investor or business partner.

Any complaint, which is defined in this policy as an expression of dissatisfaction however received (that is written or oral) and regardless of whether it is founded on valid arguments, must be treated fairly and with the utmost care. CSSF Regulation 16-07 defines a complaint thus: "[a] complaint filed with a professional to recognise a right or to redress a harm".

Complaints may be in relation to:

- a service provided/omitted by NAML;
- a product administered by NAML; or,
- the behaviour of any employee, officer or director conducting business on behalf of NAML.

Complaint Handling Process

Any employee, officer or director of NAML receiving a complaint must inform the Complaints Handling Officer immediately. This communication must include all pertinent facts and circumstances of the complaint, and if initially notified verbally must be followed up with a written notice.

The Complaints Handling Officer will then acknowledge receipt of the complaint to the complainant within 5 business days. This acknowledgement will include details of the person handling the complaint, including their job title and contact details. This acknowledgment will also contain a copy of this policy or the link to the policy on NAML's website <https://emea.nikkoam.com/ucits>.

All complaints received will be investigated promptly by the Complaints Handling Officer with the full cooperation and support of the concerned department(s). The Complaints Handling Officer shall have unlimited access to all relevant data which could potentially help resolve the issue.

An answer to the complainant must be provided within four weeks of the date of receipt of the complaint. Where an answer cannot be provided within this period, the Complaints Handling Officer will inform the complainant of the causes of the delay, and indicate a timeframe by which an answer is likely to be sent.

If the investigation results in a finding of liability of NAML and the circumstances require compensation of the complainant, this compensation must be assessed fairly and in proportion to the nature and seriousness of the complaint. Any compensation, including reimbursement of fees, is subject to the approval of the Complaints Handling Officer, and will be reported to the Board of NAML.

The final response to a complainant will confirm the nature of the complaint, that a thorough investigation was undertaken, and the conclusion of NAML in respect of the complaint.

Dispute resolution

The final response to a complainant will also make it clear that they can pursue a non-judicial alternative dispute resolution process, where the CSSF can take the role of ombudsman. Reference must be made to CSSF Regulation 16-07 and that this service is free of charge. It should also be made clear that this process does not preclude the complainant pursuing a judicial solution. Details of how the complainant can refer its complaint to the Commission de Surveillance du Secteur Financier can be found in the link below or by fax.

<http://www.cssf.lu/en/consumer/complaints/>

Fax: +352-26251-2601

Record-keeping

The Complaints Handling Officer will maintain a Complaints Register. This register will record all pertinent details relating to any complaints received by NAML and the outcomes of those complaints. The Board of NAML will review the Complaints Register at least annually, and will receive regular reporting on complaints received.

Monitoring and analysis

The Complaints Handling Officer will analyse the Complaints Register at least annually for any trends or patterns. The results of this analysis will form part of any regular reporting of the Complaints Handling Officer to the Board of NAML.

Contact

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