

Swiss Life Asset Managers Luxembourg

Complaints Handling Policy

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Complaints Handling Policy

1. Purpose

Swiss Life Asset Managers Luxembourg is required to implement and maintain efficient and transparent procedures for handling and investigating complaints. In the light of this regulatory background, the purpose of this document is to provide clear, comprehensible, precise and up-to-date information on the complaint handling procedure of Swiss Life Asset Managers Luxembourg. Furthermore, this document explains the existence of the out-of-court complaint resolution procedure at the CSSF (*Commission de Surveillance du Secteur Financier*) as the Luxembourg Supervisory Authority for the Financial Sector.

The complaint handling procedure is intended to ensure that complaints are dealt properly and promptly. Swiss Life Asset Managers Luxembourg ensures objectivity in dealing with Complaints with the aim of ascertaining the truth. Potential conflict of interests shall be identified and mitigated in accordance with the Conflict of Interest Policy of Swiss Life Asset Managers Luxembourg.

A complaint is deemed to be any expression of dissatisfaction by an investor or potential investor. The complaint or grievance may be in respect of any aspect service, marketing, administration (initial or on-going), sales process, or any other aspect of Swiss Life Asset Managers Luxembourg, its subsidiaries or branches, where a customer has got a grievance.

2. How to complain

The Complainant shall address a complaint in writing (“Complaint Letter”) indicating

- First and last name
- Contact details

The “Complaint Letter” shall describe in detail the full case history, the facts from which the complaint originates and shall encompass all necessary supporting documents.

Complainants may file complaints in the official language or one of the official languages of their Member State.

3. To whom a complaint should be addressed

The Complainant may address the complaint in first instance by sending the “Complaint Letter” to:

By E-Mail info-lux@swisslife-am.com

By Letter **Swiss Life Asset Managers Luxembourg**
4a, Rue Albert Borschette
L-1246 Luxembourg
Grand Duchy of Luxembourg

Attention to Compliance Department

By Telephone + 352 267 855 - 0

This applies to all complaints against Swiss Life Asset Managers Luxembourg, its subsidiaries or branches as well as complaints against the staff of Swiss Life Asset Managers Luxembourg, its subsidiaries or branches.

4. Responsible Person

The responsible person in the first instance is the “Complaint Handler” in charge of the complaint. If the complaint handling in the first instance did not result in a satisfactory answer for the Complainant, the written answer from Swiss Life Asset Managers Luxembourg will mention the contact details of the person responsible at management level, giving to the Complainant the opportunity to raise the complaint to the management of Swiss Life Asset Managers Luxembourg.

5. Timing of the procedure

Swiss Life Asset Managers Luxembourg acknowledges in writing the complaint or answers in writing to the Complainant within 10 (Luxembourg) business days from receipt. In both cases, Swiss Life Asset Managers Luxembourg will inform the Complainant of the name and contact details of the person in charge of the complaint (“Complaint Handler”).

Swiss Life Asset Managers Luxembourg provides the Complainant with an answer within one month from the date of receipt of the Complaint. Where Swiss Life Asset Managers Luxembourg considers that this time frame will be exceeded, the Complainant will be informed of the causes of the delay and Swiss Life Asset Managers Luxembourg will indicate the date on which the file examination is expected to be completed.

6. CSSF out-of-court resolution of complaints

Where the complaint handling at the level of the “Complaint Handler” did not result in a satisfactory answer for the Complainant, Swiss Life Asset Managers Luxembourg provides the Complainant with a full explanation of its position. Swiss Life Asset Managers Luxembourg will inform the Complainant on paper (and/or by e-mail) of the existence of the out-of-court complaint resolution procedure at the CSSF (incl. either the copy of CSSF Regulation N° 16-07 or the reference to the CSSF website) and that the Complainant can file a request with the CSSF within one year after the complaint rose the Complaint up to the level of the management of Swiss Life Asset Managers Luxembourg. Additionally, Swiss Life Asset Managers Luxembourg will confirm the decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute.

The CSSF contact details and the CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints as well as the complaint filing form of the CSSF can be found on the following sites:

Complaint filing form of the CSSF	https://www.cssf.lu/en/customer-complaints/
CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints	https://www.cssf.lu/wp-content/uploads/RCSSE_No16-07eng.pdf
CSSF E-Mail address	reclamation@cssf.lu
CSSF postal address	Commission de Surveillance du Secteur Financier Département Juridique CC 283, route d'Arlon L-2991 Luxembourg
	Fax : (+352) 26 25 1 - 2601
CSSF FAQ	https://www.cssf.lu/wp-content/uploads/FAQ_complaints_11112016eng.pdf

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