COMPLAINTS

HANDLING POLICY

STATEMENT

No portion of this policy may be copied or reproduced

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INTRODUCTION

This Policy sets out the principles and procedures adopted by NEAM S.A. ("NEAM" or the "Management Company") for the effective handling of complaints received from investors or other complaints in relation to the services provided by NEAM and/or the Fund.

The procedure set out in this Policy aims at ensure that complaints are handled promptly and effectively with a view to:

- maintaining proper and transparent relationships with investors;
- addressing concerns through appropriate dialogue, and limiting legal, operational and reputational risks.

For the purpose of this policy, a complaint is defined as: any written or electronic statement of dissatisfaction, from a natural or legal person, sent to the Distributors (i.e. Placement Banks and Distribution Platforms) or directly to the Management Company, concerning the Fund and relating to a specific act omission by the Management Company or to the services provided in relation to the Fund (e.g. the depositary bank, the administrative agent. etc). Requests for information or clarification cannot be considered as complaints.

The Fund may be distributed in several jurisdictions through Distributors (such as placement banks or distribution platform) which interact directly with the final investors.

Therefore, from an operational perspective a distinction must be made between complaints received through the Distributors, and those received directly by the Management Company.

This policy is defined, endorsed and implemented by the senior management, is shared with all relevant staff and made available to investors via the Management Company's website.

RESPONSIBILITY FOR PROCESSING COMPLAINTS

NEAM is committed to treating investors fairly and handling complaints in an effective and transparent manner. To resolve complaints effectively, complaints shall be notified in writing to the person responsible for the handling of complaints and for the implementation and maintenance of this procedure namely the Complaints Handling Officer.

NEAM's Complaints Handling Officer is Mrs. Samanta Graziosi who works in coordination with the Conducting Officers and the Compliance function. The

Complaints Handling Officer ensures that complaints are handled in accordance with this Policy and that appropriate follow-up actions are taken where necessary.

The contact details for sending the complaint (indicating to the attention of Mrs. Samanta Graziosi) are:

- by registered mail to : the registered office of **Nord Est Asset Management S.A.**

- by email to: neam@neam.lu

The complaint should include:

- a description of the acts underlying the complaint and the steps already taken by the applicant;
- an original document or certified true copy of such document showing that the person is legally entitled to act on behalf of the complainant or of a legal person;
- a copy of a valid ID document of the applicant (natural person) and, where the applicant is a legal person, of the natural person representing this legal person.

Complaints must be submitted in English or Italian.

COMPLAINTS RECEIVED THROUGH A DISTRIBUTOR

As the Management Company is not physically present in certain jurisdictions where the Fund is distribute, NEAM relies on Distributors (if any) which interact directly with the final investors. In case no Distributor has been appointed (e.g. German market), the final investor may contacts directly the Management Company which will follow the procedure as described in paragraph below of this Policy.

Complaints must be submitted by investors to the Distributors in accordance with the procedures laid down in the complaints policy applied by the relevant Distributor.

The Distributor is responsible for the initial handling of complaints received from its clients who have subscribed to the Fund's units, in compliance with the applicable financial legislation, and shall inform the Management Company without undue delay.

In order to allow the Distributor to fulfil its obligations concerning the handling of complaints, NEAM, within the scope of its responsibilities, is committed to cooperate with the Distributor, ensuring all reasonable assistance required for a prompt handling of the complaint.

NEAM maintains an oversight over complaints relating to the Fund and may request information from the Distributors regarding complaints received and their resolution.

When no amicable solution to a dispute can be reached, the Distributor shall immediately refer the matter to the Management Company, using the above mentioned contact details, sending a copy of the complaint together with all related documents. The Management Company will cooperate with the Distributor with the aim to achieve a satisfactory settlement.

The Management Company's Complaints Handling Officer will coordinate with the Distributor in order to facilitate the resolution of the complaint.

COMPLAINTS RECEIVED DIRECTLY BY THE MANAGEMENT COMPANY

The Management Company directly handles all complaints received in Luxembourg through the contact details mentioned above, as well as complaints that have not received a response or a satisfactory resolution at the level at which they were initially submitted.

The Management Company ensures that each complaint as well as each measure taken to handle it, is properly recorded in a secured electronic format.

An acknowledgement of receipt will be sent to the complainant within a maximum of ten (10) business days after the receipt of the compliant unless the answer itself is provided to the complainant within this period; at the same time the complainant will be informed of the name and contact details of the person in charge of handling the complaint.

The Management Company shall keep the complainant inform of the follow-up of their complaint

The indicative timetable for handling the compliant is within one (1) month. If an answer cannot be provided within this period the complainant shall be informed about the reasons for the delay and the expected date by which the examination of the complaint is likely to be completed.

The Management Company's Complaints Handling Officer shall then act to facilitate the prompt resolution of the complaint.

The Complaints Handling Officer must:

a) analyse the causes of individual complaints in order to identify any recuring or systemic root causes;

b) consider whether such root causes may also affect other processes or products, including those not directly subject to complaints;

c) correct, where reasonable to do so, such root causes; and

d) provide the complainant with a full explanation of the Management Company's position regarding the complaints and inform the complainant, on paper or by way of another durable medium, that they may file a request with the CSSF for out-of-court resolution of complaints, within one year after the complaint was filed with the Management Company.

Therefore, where the complaint handling does not result in a satisfactory response within one month from the date at which the complaint was submitted, the complainant will be informed that they have the possibility to follow the procedure for out-of-court resolution of complaints before the CSSF in accordance with the CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints.

Where the Management Company has undertaken to resort to the out-of-court complaint resolution procedure with the CSSF, it shall provide the complainant with a reference to the CSSF website and the different means to contact the CSSF in order to file such request.

In addition the Management Company shall inform the complainant, on paper or by way of another durable medium, that they can file a request with the CSSF and that, in this case, such request must be filed within one year from the date on which the complaint was submitted to the Management Company.

COMPLAINTS REGISTER AND COMMUNICATION TO THE CSSF

The Management Company keeps an updated Complaints Register in which are information relating to complainants, complaint received, their resolution and the measures taken are recorded as well. The register is maintained in a secure electronic format.

On an annual basis and no later than 31 May, the Management Company must provide the CSSF with a communication on the number of complaints directly handled by the Management Company together with a summary of the complaints received and, the measures taken to handle them as well as the list of third parties authorised to handle complaints.

The Management Committee is periodically informed of the complaints received and their resolution. The Complaints Register is kept updated and maintained at the registered office of the Management Company.

POLICY REVIEW

NEAM's Compliance Department reviews this Complaints Handling Policy on a regular basis and at least annually, as well as all the complaints received in order to improve procedures and processes and to reduce the likelihood of similar complaints occurring in the future.

This Policy is made available to investors free of charge on the website www.neam.lu and www.nef.lu and at the Management Company's registered office.