COMPLAINTS HANDLING POLICY & PROCEDURE

Procedure reference	Complaints Handling Policy
Concerned Department(s):	All Departments of JTC Global AIFM Solutions S.A.
Responsible (Owner of the Procedure):	MacEwan Milne, CO Compliance
Drafted by:	MacEwan Milne, CO Compliance
Reviewed by:	
Date of last review:	April 2026
Date of approval:	3 November 2026
Version:	6.1
List of associated templates	Complaints Handling Form Risk Escalation Procedure

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GLOSSARY

Board of Directors	The Board of JTC GAS who are responsible for setting the strategic direction of the firm
('CD')	Client Director
CO	Compliance Officer
CSSF	Commission de Surveillance du Secteur Financier
CSSF Circular 17/671	CSSF Circular 17/671 (as amended by Circular CSSF 18/698) on the Specifications regarding CSSF Regulation N° 16-07 of 26 October 2016 relating to out-of-court complaint resolution
CSSF Circular 18/698	CSSF Circular 18/698 on the Authorisation and organisation of investment fund managers incorporated under Luxembourg law and, Specific provisions on the fight against money laundering and terrorist financing applicable to investment fund managers and entities carrying out the activity of registrar agent
	CSSF Circular 19/718 on the Adoption of the Guidelines on complaints-handling for the securities (ESMA) and banking (EBA) sectors of 4 October 2018 (JC 2018 35)
CSSF Regulation 16-07	CSSF Regulation No 16-07 relating to out-of-court complaint resolution
Client	An individual or legal entity which has an agreement with JTC GAS
Complaint	A complaint is defined as an expression of dissatisfaction with the behaviours or services of JTC GAS, its employees and/or service providers. Complaints about fund performance are not considered to be "eligible complaints" under the CSSF's guidance. A complaint can be made in writing or verbally.
JTC GAS	JTC Global AIFM Solutions S.A.
'PRCH	Person Responsible for Complaints Handling
Related Parties	Related Parties include, but are not limited to: Fund Sponsor – the person who sources investment capital for a fund, in addition to potentially providing other services; Investment Adviser – the person who makes investment recommendations to our client; Tax Adviser – the person engaged by our client to provide tax advice and / or tax compliance services to our client; Auditor – the person engaged by our client to undertake the audit of our client's financial statements; and Anyone holding a Power of Attorney.

POLICY

It is the JTC Group's policy to deal with all Complaints in an expeditious manner, in accordance with local regulatory and legal requirements, having due regard for the expectations of the Client whilst being thorough and equitable in the investigation conducted. In this respect, the following procedure must be applied.

All Complaints will be process using the Complaints Handling Form, and where required, the escalation to the Board of Directors will be also instigated.

JTC GAS has designated the Conducting Officer in charge of Compliance, as responsible for the handling of Complaints (the 'Person Responsible for Complaints Handling' or 'PRCH') in conjunction with the relevant Client Director ('CD') and the Compliance Officer ('CO').

- All complaints should be sent in writing to the PRCH: By email: AIFM-Compliance@jtcgroup.com

- By post to JTC GAS' registered address, as found on the company's website (https://jtcglobalaifmsolutions.com/services/luxembourg/)

  JTC Global AIFM Solutions S.A.
  Person Responsible for Complaints Handling
  Bijou, 17, Boulevard F.W. Raiffeisen, L-2411 Luxembourg

if a Complaint is submitted verbally, the person receiving the call should record it on the Complaints Handling Form and submit it to the PRCH, CD and CO without delay.

Complaints can be made to JTC GAS in a language commonly used in Luxembourg, such as Luxembourgish, English, French, or German languages.
All Complaints should, as a minimum, include the following:

- A letter, received by post, or an email,
- A clear identification of the person filing the Complaint
- A summary of the issue or transaction at the origin of the complaint
- A copy of all related documents, if any
- Communication preference (post, fax, telephone, email) and respective contact details.

As soon as a Complaint is received by a member of staff, the employee should notify the PRCH and the CD and the CO and written details of the complaint must be passed to these individuals immediately.

The PRCH, the CD and the CO will assess the Complaint, allocate appropriate personnel to investigate it and will ensure that JTC GAS writes to the complainant acknowledging receipt of the Complaint within five business days of its receipt.

Where the complaint is from a Related Party of our Client, who does not have a relationship with JTC GAS, the client should be advised of the Complaint within five business days. Examples of

The PRCH, the CD and the CO are responsible for addressing the complaint at the conducting officer meeting. In order to determine whether a complaint must be escalated to the Board of Directors,

consideration will be given to the quantum of any financial risk, the likelihood of any risk (e.g. financial, reputational or regulatory) causing actual harm to the business, the seriousness of any alleged failings by JTC GAS and/or other JTC Group entities and the possibility of the Complaint being referred to any third party (which is to include regulators, the courts and insurers). Consideration will be then given at the meeting as to the appropriate course of action and whether any notification needs to be made to the CSSF and/or to JTC Group's Professional Indemnity Insurers.

Under CSSF Regulation No. 16-07, Article 5, JTC GAS should issue a written, reasoned response to the Complaint. If a satisfactory response is not provided within one month from the Complaint being sent to the JTC GAS, the complainant may refer the matter to the CSSF for out-of-court complaint resolution. If this cannot be achieved, JTC GAS should write to the complainant and provide an update on the investigation. The Conducting Officers and Board of Directors should be advised of all Complaints that are not resolved within 30 days, the reasons for the delay, and an estimate of by when this should be completed. This should be repeated at 30-day intervals until the Complaint is resolved.

Details of the Complaint must be logged in the Luxembourg Complaints Register by the CO. The log must be updated following the assessment below, and thereafter with a note of any subsequent actions taken. The original Complaint letter must be filed in the Complaints File.

Whether or not an escalation measure takes place, the PRCH and the CO will monitor the processing of the Complaint to ensure that a satisfactory conclusion is reached. This can only happen when JTC GAS has complied with the applicable requirements, namely CSSF Regulation 16-07, and CSSF Circulars 17/671 and 19/718.

As JTC GAS is part of a Group, listed on a Securities/Stock Exchange, consideration must also be given to advising the relevant authority of the complaint. Advice should be sought from the Group headquarters in that respect. This can be obtained from George Kellogg, Head of Risk & Compliance - Institutional Capital Services.

Where Group requirements relating to Complaints exceed the above, the CO must ensure that the Board of Directors are made aware of such additional requirements, and the actions being taken in that regard must be included within the report.

When the PRCH deems that a Complaint has been resolved, the complainant must be informed in writing together with the steps the client may take if they are unsatisfied with the response. See "CSSF Regulation No. 16-07", Article 5 for more information.

The CO must monitor the Complaints Register and advise the CSSF of complaints received by JTC GAS on an annual basis. The report must be submitted by 31 May, using the form in CSSF Regulation 16-07 "Tableau recensant les réclamations enregistrées par le professionnel".

OUT OF COURT RESOLUTION OF COMPLAINTS

Clients are informed that, should they remain dissatisfied with the response received from JTC GAS, they have the right to escalate their complaint to the CSSF for the purpose of out-of-court complaint resolution.

The CSSF is the competent authority in Luxembourg for handling requests (“Request”) related to the out-of-court resolution of complaints from clients of professionals under its supervision, including JTC GAS. The objective of this procedure is to facilitate an amicable settlement between the parties.

The out-of-court resolution process with the CSSF is free of charge, however, the CSSF will not reimburse any legal or other costs incurred by the parties involved in the complaint.

In accordance with CSSF Circular 17/671, as amended by CSSF Circular 18/698, any Request to the CSSF must be submitted within one year of the date on which the original complaint was submitted in writing to JTC GAS.

Complaints submitted to the CSSF must be made in writing and include a copy of the initial complaint to the professional, any response received, and supporting documentation.

Further details, including the procedure, conditions of admissibility, and complaint form, are available on the CSSF’s website at: https://www.cssf.lu/en/customer-complaints/.

PROCEDURE

WRITTEN COMPLAINTS

- As soon as a Complaint is received, it must be considered by the PRCH, the CD and the CO as soon as possible. The CD is to complete and sign Parts 1 & 2 of the Complaints Handling Form (as described therein) and scan it to Luxembourg’s CO (Annex 1).
- The CO must add the Complaint to JTC GAS’ Complaints Register, provide a reference number to the CD, monitor the Complaint and update the Register until the complaint has been resolved to the satisfaction of the CO. M:\Compliance\Complaints and Claims\Complaints.
- The PRCH should complete the remainder of the Complaints Handling Form and provide regular updates to the CO until the Complaint has been resolved.
- The PRCH must provide to the complainant, in writing and within five business days, an acknowledgement that their Complaint has been received and being considered.
- The PRCH must keep the complainant informed about the progress of their Complaint, including any details of any action being taken to resolve it.
- Where the CSSF has been notified of a Complaint, periodic updates should be provided to the CSSF until the complaint has been resolved. The CO must also be advised and kept updated.
- When the PRCH considers that the Complaint is closed, the complainant must be informed in writing. Where the Complaint has not been upheld by JTC GAS and/or JTC Group, the reason(s) for rejecting the complaint must be clearly stated.
- If the CSSF has been notified of the Complaint previously, they must also be informed of its closure in writing.
- Where possible, originals, but in any case, copies, of all correspondence with the CSSF, whether by letter or email, must be provided to the CO. The CO must record all correspondence with the CSSF and file hard copies on the CSSF Correspondence File. The Table of CSSF Correspondence is located under M:\Compliance\CSSF\CSSF Communication .
- Copies of all correspondence with the complainant and file notes must be provided to the CO. Details of any compensation or compromise agreed with the complainant must also be provided to the CO, who will add them to the Complaints Register. The CO must maintain the Complaints Register and file hard copied of documents received in the Complaints File.

VERBAL COMPLAINTS

Verbal complaints may be treated the same way as written complaint, depending on the assessment of the seriousness of the complaint and in compliance with the applicable regulation.

Should the PRCG, CD and CO consider the complaint as relevant, the procedure described above will be followed.

Wherever practical, staff receiving complaints by phone or in person should direct the complainant to the PRCH, CO or the Client Director. In all instances, the person receiving the Complaint should take the complainant's name, contact number, company name and address (where applicable) and request that the complainant put their complaint in writing. In the meantime, the verbally transmitted complaint will be summarised by the person who spoke to the complainant. The summary of a verbal complaint is to be treated the same way as a written complaint and therefore the same procedure must be followed.

ENFORCEMENT AND APPROVAL

This Policy shall be distributed internally within JTC GAS. It shall be electronically accessible to all staff. Any external distribution (to third parties) is subject to the decision of the Compliance Officer or the Conducting Officers of the Company.

All Employees, Conducting Officers and Directors of the Company are responsible for complying with the Complaints Handling Policy. Failure to comply with this policy may incur disciplinary action against or the termination of the appointment/employment of a respective person, as appropriate under the circumstances in question.

This Policy shall be kept up-to-date considering the evolution of the Company's activities and reviewed by the Compliance Officer at least annually (or ad-hoc if changing circumstances require this) to ensure that it is accurate and includes any changes in Laws and Regulations and/or changes in the Company's business activity.

For its entry into force, this Policy shall be approved by the Board of Directors of the Company.

VERSION HISTORY

The following table describes the history of this document.

Version:	Date issued:	Reason for update:	Updated by:
1.0	June 2018	Creation	NL
2.0	October 2022	Annual Review	LLO
3.0	August 2023	Annual Review	LLO
4.0	March 2024	Update	LLO
5.0	March 2025	Annual Review	LLO
6.0	May 2025	Improvements – Internal Audit	LLO
6.1	May 2026	Annual review	MAM

ANNEX 1

Complaints Handling Form.docx