

MAINFIRST



COMPLAINT MANAGEMENT PROCEDURE

MAINFIRST AFFILIATED
FUND MANAGERS
(DEUTSCHLAND) GMBH

10/2023

Version 6.1

Complaint management procedure

The complaint management procedure lays down the principles and procedures for recording, processing and resolving customer complaints. The adequacy and efficiency of the principles mentioned here as well as the compliance with legal (e.g. WpHG, MIFID II) and regulatory announcements by BaFin is regularly reviewed by the company and necessary adjustments are made and published in written updates to this procedural description. The current version of the complaints management procedure takes into account the legal and regulatory requirements for adequate complaint management and informs complainants about the procedure for registering and resolving complaints.

Please address your complaint to:

Contact person: Thomas Merx
Tel.: +49 69 24437 4407
Email: t.merx@mainfirst.com

Naturally, the complaint is dealt with free of charge. We assure prompt processing of your complaint.

Legal and regulatory requirements form the regulatory basis for the design and implementation of a standardised complaint management system. The requirements defined therein have been used as a basis in the complaint management procedure of MainFirst Affiliated Fund Managers (Deutschland) GmbH (MainFirst). This procedure is effective and transparent and ensures that complaints are handled reasonably and quickly. In accordance with regulatory requirements, a member of the Executive Board has been appointed as the person responsible for the documentation and handling of complaints. In addition, the rules of representation set out by MainFirst shall apply.

A complaint is the expression of dissatisfaction of a customer to MainFirst with the purpose

- of drawing attention to conduct subjectively perceived as harmful,
- of achieving redress for impairment(s) (objective damage) suffered
- of initiating an analysis and clarification of a criticised issue.

Consequently, simple requests for information cannot be considered to be official complaints.

Customers of MainFirst are deemed to include natural and legal persons, in particular investors and contractors of MainFirst and intermediaries. They are complainants.

Complaint management is understood to mean all the following systematic measures which MainFirst takes with regard to complaints from a customer in order to restore satisfaction, eliminate further potential for complaints and resolve any potential for harm. The primary aims of complaint management are:

- restoring or maintaining customer satisfaction
- minimising the negative impact of customer dissatisfaction on the company

- using the advice included in complaints on operational weaknesses
- avoiding or minimising the costs resulting from troubleshooting.

In addition, other individual objectives of the investor and contractor may be addressed by a complaint and require complaint management.

Complaint processing focuses on reviewing and resolving the concerns of each customer. Complaints are handled with the necessary due diligence, transparency and objectivity. Complaints are processed in an effort to be objective and get to the truth. Complainants can contact the company with questions, comments and complaints by letter, telephone and email. All incoming complaints are centrally collected and processed at MainFirst. No complaint will be left unanswered. Complaints are definitively processed, if possible, within five bank working days and the results are communicated to the complainant.

MainFirst shall respond to customer enquiries or complaints, unless a different decision by the Executive Board of Directors has been made in individual cases. If a swift resolution of the complaint within five bank working days is not possible due to the complexity or other reasons, the complainant shall receive an interim message on the processing status.

The latest applicable principles for the complaint management procedure are published on the homepage of MainFirst (www.mainfirst.com).

A central complaint file is kept at MainFirst. Any complaints and their processing status are communicated to the Executive Board of MainFirst once a month within the framework of the management information system.

All documents relating to individual complaints (correspondence, emails, customer data, etc.), including information on the course of processing and settlement, are centrally documented and archived at MainFirst. Complaints are recorded and archived electronically. In addition, the monitoring and evaluation is carried out in written form at MainFirst.