



COMPLAINTS HANDLING POLICY

JUNE 2025

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Revision Log

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4.0	Maria Elena Migneco	11/2024	Annual Review
5.0	Sarah Farrugia	06/2025	Change in Company Name

About

Investors Europe (Malta) Limited (hereinafter referred to as “the “Company”) is a limited liability private exempt company registered in Malta with registration number C83564 with its registered address at 4, Level 1, Sappers Street, Valletta, VLT 1320, Malta. The Company is licensed and regulated by the Malta Financial Services Authority (MFSA) in terms of the Investment Services Act (Chapter 370, Laws of Malta) (the “ISA”) and is authorised to provide:

- Depositary services to all collective investment schemes; and
- Trustee, Custodian or Nominee services to Retail Clients, professional Clients (excluding collective investment schemes) and Eligible Counterparties;
- Reception and transmission of orders to Retail Clients, Professional Clients (including collective investments schemes) and Eligible Counterparties;
- Execution of orders on behalf of clients to Retail Clients, Professional Clients (including collective investment schemes) and Eligible Counterparties;
- Placing of financial instruments without a firm commitment basis to Retail Clients, Professional Clients (including collective investment schemes) and Eligible Counterparties; and
- Dealing on own account to Professional Clients (including collective investment schemes) and Eligible Counterparties (on a Match-Principal basis only).

in relation to the investment instruments listed in the Second Schedule to the ISA.

Purpose

This Complaints Handling Policy (hereinafter referred to as “the Policy”), which is prepared in accordance with the Investment Services Act, MFSA Conduct of Business Rulebook and the Arbitrator for Financial Services Act, is aimed at ensuring that all complaints presented by you, our clients, or complaints submitted on your behalf by an authorised representative such as a family member or lawyer, are handled promptly, equally, fairly and efficiently.

This Policy applies to all clients of the Company. However, if you are dealing with the Company through a financial intermediary, such as an investment advisor or asset manager, please direct your complaint to the primary contact at the financial intermediary, as they will be in a better position to investigate your complaint.

What is a Complaint?

The Conduct of Business Rulebook defines a complaint as *“a statement of dissatisfaction addressed to the Company by a Client relating to the provision of an investment service/ product provided by the Company pursuant to its licence”*.

A Client means a person who is the recipient/purchaser of a product/service offered by the Company.

How Can You Make a Complaint?

You can make a complaint by any reasonable means, being in writing, verbally or in person. If a complaint is presented verbally, we would still ask you to submit the complaint in writing, either in the form of a letter or an e-mail. If you make a verbal complaint, but do not follow-up this up in writing, we will nevertheless, investigate the complaint. However in this case, we shall make a summary of the complaint and request the Client to confirm in writing the said summary and send a signed copy of the complaint to the Company. All complaints are made free of charge.

All written complaints should be addressed to the Compliance Officer at Investors Europe (Malta) Limited, 4, Level 1, Sappers Street, Valletta, VLT 1320. If sent by e-mail, please address the e-mail to compliancedesk@investorseurope.com, marked for the attention of the Compliance Officer.

What Information is to be Included in the Complaint?

When lodging a complaint, you are requested to include all the details regarding the issue raised. You may also attach supporting documentation to further support the complaint brought forward. As a minimum, the Client should include the following information:

- Name and address of the Client;
- Contact details of the Client (e.g. telephone number and/or email address);
- If the complaint is being handled by an external representative, include external representative name and contact details;
- A description of the complaint and how it affected the Client;
- Supporting documentation for the complaint; and
- When the incident(s) occurred.

What Will We do Once We Have Received Your Complaint?

The Company has an obligation to investigate any complaints which it formally receives and treat each one with utmost fairness. When receiving the complaint, an acknowledgement letter is sent out within three (3) business days, enclosed with our Complaints' Procedure and the details of the Office of the Arbitrer for Financial Services. We will ensure that you are kept informed thereafter of the progress of measures taken for your complaint's resolution. Our aim is to resolve complaints within fifteen (15)

business days from date of receipt. Where the investigation of a complaint is not completed within 15 business days from receipt of complaint, the Company shall:

- Inform the complainant about the causes of the delay; and
- Provide an indication as to when the investigation is likely to be completed.

The Compliance Officer may also appoint an employee of sufficient standing and competence within the Compliance department, to investigate the complaint. The employee has fifteen (15) business days to investigate the matter and the Company ensures that the appointed person would not have been directly involved in the subject matter relating to the complaint as to avoid any conflicting interests.

Investigating and Resolving Your Complaint

We ensure that within the fifteen (15) business days' time limit, we will investigate the complaint competently, diligently, and impartially, obtaining additional information as necessary and assess the complaint fairly, consistently, and promptly in line with this Policy.

We will, considering all relevant factors, take into consideration:

- the subject matter of the complaint;
- whether the complaint should be upheld;
- what remedial action or redress (or both) may be appropriate; and
- if appropriate, whether there is reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.

When the investigation is completed, we will:

- offer redress or remedial action when we decide this is appropriate;
- explain to you promptly and in a way that is fair, clear, and not misleading, our assessment of the complaint, our decision on the matter and any offer of remedial action or redress; and
- comply promptly with any offer of remedial action or redress accepted by you.

Timeline for Responding to You

We must, by the end of the fifteen (15) business days from the receipt of your complaint, send you a 'final response' or a written response which explains why we are not able to make a 'final response' and indicate when we expect to issue one.

A 'final response' is a written response which encloses either of the scenarios below:

- an acceptance of the complaint and, where appropriate, an offer of redress or remedial action;
- an offer of redress or remedial action without accepting the complaint;
- a rejection of the complaint and a justification for doing so.

Should you remain dissatisfied with our 'final response', or should we be unable to issue a 'final response' within fifteen (15) business days of your complaint, we will inform you that you may refer your complaint to the Office of the Arbiter for Financial Services (OAFS) as well as provide information on the Arbiter for Financial Services, including its website address.

The Arbiter for Financial Services

You may refer your complaint to the Arbiter for Financial Services if you are not satisfied with the outcome of your complaint and satisfy the criteria of an eligible complainant. Complaints can be submitted to the Arbiter for Financial Services by completing the Complaint Form and sending it to the Arbiter together with supporting documentation and applicable fees. Your rights are clearly set out in the website of the Arbiter for Financial Services, accessed via the following link:

<https://www.financialarbiter.org.mt/content/step-1-complain-your-provider>

Please remember that if you wish to refer a complaint to the Arbiter for Financial Services, you must do so within six months of receiving our final response.

When is a Complaint Considered Closed?

A complaint can be considered as closed when the Company sends a 'final response' and the complainant has indicated in writing his/her acceptance of an earlier response from us or when the Arbiter for Financial Services informs us in writing that the complaint has been closed.

Record Keeping and Data Protection

Any action taken by the Company in relation to the management of complaints, including this Policy, should be duly documented, and kept for audit purposes. The Company ensures that all complaints are treated with due consideration. Your information and personal data will be treated as confidential, in line with the Data Protection Act Chapter 586 and the Company's Record Keeping Policy and Data Protection Policy.

Staff Competence

The Company shall ensure that training is provided to staff involved in the management of complaints on a regular as well as on a needs basis, to help staff maintain their knowledge and expertise and to further support their understanding of Complaints Management.

Contacting Us

If you have any queries regarding this Policy, kindly provide your feedback to the Compliance Officer at Investors Europe (Malta) Limited, 4, Level 1, Sappers Street, Valletta, VLT 1320 or send an e-mail to compliancedesk@investorseurope.com marked for the attention of the Compliance Officer.