

Jupiter Asset Management International S.A.

Complaints policy



This Policy applies to Jupiter Asset Management International S.A. and/or any of its branches.

<b>Version</b>	September 2021
<b>Policy Owner (Senior Manager/Board/Committee)</b>	Conducting officer in charge of complaints handling
<b>Frequency of Review</b>	Annually
<b>Last Review</b>	20 September 2021

# 1. OVERVIEW

## 1.1. Purpose

The purpose of this policy (the “**Policy**”) is to handle, with reference to the activities carried out by or on behalf of Jupiter Asset Management International S.A. (referred to as the “**Company**” or “**JAMI**”), including activities carried out by a delegate, sub-delegate or counterparty, any complaints received in relation to JAMI, its delegates, or the product under JAMI’s management (the “**Product**”).

## 1.2. Scope

This Policy applies to all levels without restriction of all employees of the Company (including those of the branches of the Company) (together referred hereinafter as the “**Employees**”), to JAMI’s conducting officers and the members of JAMI’s board of directors (the “**Directors**”) and to all service providers acting for or on behalf of the Company, to ensure full compliance with laws, regulations, rules, and professional standards.

## 1.3. Responsibility

It is the responsibility of all Employees to undertake their role within the Company having regard to the Company’s and Jupiter’s policies and procedures concerning the complaint handling. Failure to observe these requirements endangers the interests of the Company and Jupiter’s clients and exposes the Company and Jupiter to potential legal and regulatory censure and Employees to both potential internal and external disciplinary action.

In the event Employees are concerned that the Company’s requirements regarding the complaints handling are being breached they should report the matter to the Company’s conducting officer in charge of compliance and the Management Committee (as defined below) immediately.

## 1.4. Accountability

This Policy is administered by the conducting officer in charge of complaints who is responsible for the day-to-day oversight of this Policy.

The JAMI’s management committee (the “**Management Committee**”) and the Directors are accountable for this Policy.

This Policy and any material amendments must be approved in writing by JAMI’s board of directors (the “**Board**”) and the Management Committee.

Non-material amendments to this Policy can be approved by the Management Committee.

## 1.5. Governance

This Policy is subject to an annual review by an annual review by the Company’s conducting officer in charge of the complaints handling.

## 2. The Policy

### 2.1. The Policy

This Policy applies to all employees of the Company, including the employees of the Company's branches.

#### 2.1.1. Jupiter group

Jupiter Fund Management Plc and its subsidiaries (collectively referred to as “**Jupiter**”) operates a common approach across the group in relation to the complaints handling.

#### 2.1.2. Handling of complaints

A complaint is as any type of dissatisfaction expressed by the client in relation to the Products or the activity of the Company, as further defined in CSSF regulation 16-07, CSSF circular 17/671 and CSSF circular 18/698, as may be amended from time to time.

All complaints must be and handled and forwarded to a member of the Management Committee, appointed by the Company, and notified to the CSSF as the person in charge of the customer complaint handling process (“**Complaints Handling Officer**”).

The Complaints Handling Officer is responsible for ensuring that JAM and the depositary, the central administration agent and/or the registrar and transfer agent of the Products (the “**Delegated Party**”), bring to the Company's attention all Complaints which are brought to JAM and the Delegated Party attention.

The Complaints handling in relation to the funds under JAMI management have been delegated to the central administration agent of these fund (the “**Central Administration**”).

The Complaints Handling Officer will gather the relevant information from the relevant parties, necessary to assess and address the Complaint in an accurate manner.

In case the Complaint relates to the services rendered by JAM or the Delegated Party in relation to the Products, the Complaints Handling Officer must forward this complaint to the Delegated Party.

The Complaints must be recorded in the register of the complaints (“**Register**”) by the Complaints Handling Officer.

The Complaints Handling Officer must ensure that each Complaint as well as each corrective measure taken to handle it, are properly registered in the Register.

#### 2.1.3. Submission of complaint

Any Complaints in relation to the funds under JAMI management, should be submitted to the Central Administration, as indicated in the prospectus of the funds under JAMI management, and the Central Administration will respond to any enquiry or complaint.

Any Complaints in relation to the remaining, except for the funds under JAMI management, Products should be directly to JAMI's office.

#### 2.1.4. Follow-up on Complaints

The Complaints Handling Officer must analyse on a regular basis all data relating to the Complaints in order to detect and prevent any recurring or systemic problem, as well as any potential legal or reputational risk, in particular:

- by analysing the features of the Complaints in order to identify the root causes common to some complaints;
- by considering whether these root causes may also affect other processes of the Company, including those to which the Complaints do not relate directly.

If deemed necessary by the Complaints Handling Officer, an action plan must be designed by the latter and implemented by the relevant department of the Company in order to prevent the occurrence of situations similar to those which caused a particular Complaint in the first place.

## **2.2. The Complaints Handling Officer**

In accordance with the relevant provisions of the CSSF Circular 18/698, as may be amended from time to time, the Company has appointed the Complaints Handling Officer.

At the time of issue of this Policy, the conducting officer responsible for the compliance function, who is also the Company's compliance officer, has been appointed by the Board as the Complaints Handling Officer.

The Complaints Handling Officer is mainly in charge of:

- coordinating the handling of the Complaints addressed to JAM and the Central Administration based on a commonly agreed upon complaints handling process;
- dispatching the Complaints received directly by the Company to JAM or JPM, respectively, if related to portfolio management issues or operational issues;
- making sure that the members of the Management Committee and the Board of Directors obtain information on an on-going basis about the Complaints.

### **2.2.1. Information to the Management Committee**

The Complaints Handling Officer shall inform the Management Committee of the Complaints received, including suggestion for the Complaint's resolution/mitigating factors, exercised follow-up etc., at least on monthly basis.

### **2.2.2. Information to the Board of Directors**

The yearly report of the compliance function report, which is submitted by the conducting officer responsible for this function to the Board of Directors at one of its quarterly meetings, must include an account of the total number of Complaints received in the course of the previous calendar year and of their handling.

### **2.2.3. Reporting to the CSSF**

On an annual basis, the Complaints Handling Officer must submit to the CSSF a table detailing the total number of the Complaints received, their nature, listed by categories, as well as a summary report of their handling and of the corrective measures taken.

## **2.3. Relevant laws and regulations**

This Policy conforms to the regulatory standards set by the CSSF in the CSSF circular 18/698 relating to the Authorisation and organisation of investment fund managers incorporated under Luxembourg law as may be amended from time to time, CSSF Regulation N° 16-07 relating to out-of-court complaint resolution, and CSSF circular 17/671 relating to Specifications regarding CSSF Regulation N° 16-07 of 26 October 2016 relating to out-of-court complaint resolution as may be amended from time to time, and any other relevant laws, circulars and regulations.

## **2.4. Non-compliance**

Consequences of non-compliance, to the extent applicable to the Policy, may result in disciplinary action or dismissal.

## 3. ADDITIONAL INFORMATION

### 3.1. Breach Guidance

In the event of a breach or potential breach of this Policy, an employee must inform the Compliance Function.

### 3.2. References

This Policy should be read in conjunction with the following documents:

- Jupiter group Compliance Manual
- The Company's Complaints Procedure

### 3.3. Internal/External Publication

This Policy will be published internally.

# Appendix

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description</b>	<b>Approver</b>
1.0	February 2019	Dermot Mulvin	Complaints policy	Management Committee (25 February 2019)
2.0	September 2019	Kasia De Oliveira Santos	Update with new Jupiter template	Management Committee (5 September 2019)
3.0	September 2020	Kasia De Oliveira Santos	Modalities for submission of complaints, legal references	Board of directors (11 November 2020)
4.0	September 2021	Kasia De Oliveira Santos	Update with new Jupiter template, definition of Delegates and the Products	Management Committee (30 September 2021)