

Clearstream Fund Centre S.A.
Luxembourg (CFCL)

Principles of the management of Complaints

January 2023

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1. Introduction

This summary of the complaints handling policy is government by rules that are accessible to the complaint and relevant staff, transparent, fair, allow for a prompt handling of complaints. It will highlight the main points regarding the requirements for a complaints and the procedure for complaints management. This summary has been made available to customers as part of the obligations to inform the customers of their rights with regards to complaints handling and their rights under Article 16 of MiFID II and Article 26 of the MiFID Delegated Regulation.

2. General requirements for a complaint

In order to be eligible to make a complaint, the complainant must:

- (1) Have a contractual relationship with the entity that is responsible for the complaint.
- (2) Must be seeking a remedy in respect of a financial loss or a measurable impairment of the complainants business.

The complaint procedure is free of charge.

A complaint does not require a specific form however in order to allow transparency and fair treatment of a complaint, formal requirements can be defined within entity specific complaints management procedures.

As a minimum, the complainant must provide the following details:

- Name;
- Name of the representative, if any;
- Address/phone number/email address;
- Detailed description of the facts underlying the complaint; and
- Any document supporting the content of the complaint.

Formalised complaints procedures are in place for Clearstream Fund Centre S.A. Luxembourg, which include:

- (1) The internal investigator should acknowledge receipt of the complaint to the complainant within a predefined period of time. The time to acknowledge the recipe should not exceed 10 business days.
- (2) A reasonable period of time to process and respond to the complaint. The time can vary depending on the type of complaint.
- (3) All complaints, processing and decisions need to be documented by the internal investigator without delay in order to ensure a timely closure.
- (4) The response to a complaint will be made in writing in a clear language.
- (5) The internal investigator shall include the explanation of the firm's position on the complaint set out.

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3. Contacts for complaints

The customer can raise their complaints to either their relationship manager or through the following contacts:

Clearstream Fund Centre S.A. Compliance at the following address:

CFCLComplaints@clearstream.com

4. Procedure for out-of-court resolution of complaints before the CSSF

By the present disclosure, the complainant is informed of the existence of an out-of-court complaint resolution procedure in accordance with the CSSF Regulation number 16-07 at the:

Commission de Surveillance Secteur Financier (CSSF).
283 Route d'Arlon
L-2991 Luxembourg

All the details regarding this out-of-court process can be easily obtained consulting the CSSF website using the following link: <https://www.cssf.lu/en/consumer/complaints/>

The decision to accept or reject a complaint is derived in a fair and professional way, taking into account all available information on the complaint. A written documentation will be prepared setting out the findings, conclusions and reasons for conclusions.

The decision of the internal investigator shall be subject to a four eye principal which should be documented. This principle might include a least one other member of the internal investigator having to review the written documentation.

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