

## › Lab Luxembourg S.A. – Customer Complaints Handling

### 1. Customer Complaints

The protection of the interests of our customers is the highest priority of Lab Luxembourg S.A. (Labgroup). Our various certifications clearly illustrate this: ISO 27001, ISO 9001, PSDC status and PSF support (Professional of the Financial Sector). This also applies to the way we handle complaints from our customers. Please find below the complaints and escalation procedures as defined by the Complaints Handling Policy.

### 2. Complaints handling

All customer complaints may be submitted to any person at Lab Luxembourg S.A. (Labgroup), and/or directly to Labgroup's Service Desk (please find contact details below).

If the complaint is made directly to the Compliance Department in writing (by written mail or email) ("Formal Complaint"), Labgroup will acknowledge the receipt of the Complaint within ten (10) days of receipt and the Complainant will receive a formal response to his/her complaint no later than one (1) month after he/she has sent the Formal Complaint. If the processing of the Formal Complaint takes longer than one (1) month, the Complainant will be informed about the causes of the delay and be provided with a time for the response.

If a complaint is made in a different way than the Formal Complaint, Labgroup will acknowledge the receipt of such a non-formal complaint usually within two (2) business days but no later than ten (10) days from receipt and will inform the Complainant that, although Lab Luxembourg S.A. (Labgroup) will continue to investigate the matter, this non-formal complaint does not meet the pre-requisites to enable an escalation to the CSSF as set out below and will notify the Complainant about the applicable complaints procedures that are required before the escalation to the CSSF.

Nevertheless, Labgroup seeks to send to the Complainant a response to his/her non-formal complaint no later than one (1) month after he/she has sent the complaint.

The Complainant may at any time make a Formal Complaint to the Compliance Department.

If the Complainant does not obtain an answer or a satisfactory answer, complaints can also be directly addressed to the responsible member of management of Lab Luxembourg S.A. (Labgroup):

3 rue Dr Elvire Engel, L-8346 GRASS  
Phone: +352 350 222 999  
Fax: +352 350 222 350  
[servicedesk@labgroup.com](mailto:servicedesk@labgroup.com)

### 3. Escalation to the Commission de Surveillance du Secteur Financier (CSSF)

In case the Complainant does not receive an answer or a satisfactory answer to his Formal Complaint, the Complainant is herewith informed of the ability to escalate its claim to the CSSF following the terms and conditions described in Regulation CSSF 16-07, relating to out-of-court complaint resolution by written mail to:

Commission de Surveillance du Secteur Financier (CSSF)  
Département Juridique CC  
283, route d'Arlon  
L-2991 Luxembourg

Or by fax to:

(+352) 26 25 1 – 2601

or online via its website <http://www.cssf.lu/en/consumer/complaints/>

The following conditions must be met to be able to escalate to the CSSF:

- Prior to escalating the complaint to the CSSF, the Complainant must have previously sent the complaint in writing to Labgroup's Compliance Department and has not received an answer or a satisfactory answer within one (1) month from the date at which the complaint was sent.
- The complaint to the CSSF must be filed with the CSSF (as described above) one (1) year latest after the complaint with Labgroup's Compliance Department has been filed.
- The complaint to the CSSF shall be supported by a statement of the reasons on which it is based, including the following documents:
  - o a detailed and chronological statement of the facts underlying the complaint and the steps already taken by the applicant;
  - o a copy of the prior complaint submitted to Labgroup;
  - o a copy of the answer to the prior complaint or the confirmation by the applicant that he/she did not receive a reply one month after he/she sent his/her prior complaint;
  - o the statement of the applicant that he/she did not refer the matter to a court, an arbitrator or another out-of-court complaint resolution body in Luxembourg or abroad;
  - o the agreement of the applicant with the request handling conditions of the CSSF as the body responsible for the out-of-court resolution of his/her complaint;
  - o the express authorisation of the applicant so that the CSSF can transmit its request (including the attachments) as well as any future correspondence or information to the company concerned by the request;
  - o in the case where a person acts on behalf of an applicant in accordance with paragraph (7) or on behalf of a legal person, a document showing that the person is legally entitled to act so;
  - o a copy of a valid ID document of the applicant (natural person) or, where the applicant is a legal person, of the natural person representing this legal person.

The CSSF may request the production of any other document or information it deems necessary to handle the request.

Please note that complaints to the CSSF are free of charge (and no charges will be reimbursed to the Complainant) and may be filed in Luxembourgish, German, French or English.

#### 4. Contact details

The point of contact for Formal Complaints is:

3 rue Dr Elvire Engel, L-8346 GRASS  
Phone: +352 350 222 999  
Fax: +352 350 222 350  
Email: [servicedesk@labgroup.com](mailto:servicedesk@labgroup.com)