



<p>COMPLAINTS HANDLING POLICY</p>
<p>DECEMBER 2023</p>

*This policy sets out the legal & regulatory requirements, as well as the related actions, which ING Solutions Investment Management S.A. (below the “**ManCo**” or “**ISIM**” or “**the Company**”) complies with in order to meet its obligations, in the area of complaints handling, in accordance with CSSF Circular 19/718, CSSF Regulation N°16-07 dated 11 November 2016 relating to the out-of-court resolution of complaints, CSSF Circular 17/671 and CSSF Regulation 10-04.*

ManCo process:

The member of the management board in charge of the administration function is **the authorized manager** in charge of the implementation of the written complaint management policy, who delegates this function to the compliance officer. The compliance officer will inform the member of the management board on a regular basis of the status of complaints.

Any complaints regarding the ManCo should be addressed in first instance to:

ING Solutions Investment Management S.A.

Mrs Noemi MADAU

26, place de la gare L-1616 Luxembourg

compliance.isim@ing.com

Where in first instance, the complainant did not obtain an answer or a satisfactory answer, the complaint may be addressed to the management board of the Company to:

ING Solutions Investment Management S.A.

Mrs Sandrine Jankowski

26, place de la gare L-1616 Luxembourg

Sandrine.jankowski@ing.com

Any complaints regarding the investments funds should be addressed in first instance to the financial advisor, alternatively, the above ManCo contact can be used.

The complaint shall be supported by a statement of the reasons on which it is based together with the following documents:

- A detailed and chronological statement of the facts underlying the complaint and the steps already taken;
- In the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that person is legally entitled to act so;
- 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.

This complaint management policy is available free of charge upon request. It has also been posted on the Company's website.

Written acknowledgment of receipt is provided by the ManCo within a period of maximum 10 business days after receipt of the complaint.

An answer is in any case provided within a period of maximum one month between the date of receipt of the complaints and the date at which the answer was sent. Where an answer cannot be provided within this period, the Company shall inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

Where the complaint handling did not result in a satisfactory answer for the complainant, the Company shall provide the complainant with a full explanation on its position as regard the complaint.

The ManCo shall inform the complainant, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure at the CSSF and if the case arises, the Company confirms its decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute. In such a case, ISIM shall send to the complainant a copy of the CSSF Regulation 16-07 or the reference to the CSSF website, as well as the different means to contact the CSSF to file a request.

The ManCo shall also inform the complainant, on paper or by way of another durable medium, that the complainant can file a request with the CSSF within one year after the complainant has filed his/her request to the Company.

The ManCo shall analyze the data relating to the complaint handling, on a permanent basis, in order to enable the identification and treatment of any recurring or systemic problem, as well as any potential legal and operational risks, for example:

- by analysing the causes of the individual complaints in order to identify the root causes common to certain types of complaints;
- by considering whether these root causes may also affect other processes or products, including those to which the complaints do not relate directly; and
- by correcting these root causes, when it is reasonable to do so.

In case of identification of such risks, they will be reported to the management board.

Article 7 of CSSF Regulation 10-04 requires that management companies record any complaints as well as the measures taken in response to such complaints. All complaints either sent directly to the registered office or to the above mentioned email address on the one hand, or escalated from the financial intermediaries or service providers on the other end shall be registered in a dedicated database.

ISIM communicates annually (within 5 months following the end of the financial year of the Company) to the CSSF the number of complaints received, classified by the type of complaints, a summary report of the complaints and the measures taken to handle them.

The CSSF may be required by the complainant to intervene with a view to facilitate the amicable resolution of the complaint. The procedure is not a mediation procedure within the meaning of the law of 24 February 2012 introducing the mediation in civil and commercial matters as amended. A request shall not be admissible in the cases listed in article 4 of the Regulation 16-07. The request shall be introduced to the CSSF in compliance with the provisions of the article 5 (2) and (3) of the Regulation 16-07. The CSSF transmits such request to the professional which shall take position within one month of the receipt of the file.

While analyzing the file relating to the request, the CSSF may request the Company and the complainant to provide it with additional information, documents or explanations, in any form whatsoever, and to take position on the facts or opinions as presented by the other party within a reasonable period that cannot exceed three weeks.

This Policy shall be reviewed by the Compliance Officer and validated by the Management Board for entering into force.