



BC Partners Management S.à r.l

Société à responsabilité limitée

Registered office: 18 rue Erasme, L-1468 Luxembourg

R.C.S. Luxembourg B. 213861

(the "AIFM" or "BCPM")

Complaints Handling Policy

May 2023

Guideline Updates

Last approved by the Board of Managers: 31/05/2023

Review Period; every year and/or event basis

Version History

Version	Policy Owner	Description of changes	Approved by the SMC	Approved by the Board of Managers
1.0	CCO	Initial version of the Policy	19.10.2023	31.05.2023
1.1	CCO			

CONTENTS

BC Partners Management S.à r.l.....	1
Complaints Handling Policy	1
Summary	3
1. Purpose and scope	3
2. Definition of a complaint	3
3. Complaints Handling Procedure	3
4. Record	5
5. Publication.....	5
6. Reporting to the CSSF	5

Summary

- The policy aims to provide clear and precise instructions for AIFs' investors/clients on how to file a complaint with the AIFM.
- The policy (or a summary) should be made available to the AIFs' investors/clients.
- The policy is intended to ensure that complaints are dealt with properly and promptly

1. Purpose and scope

In accordance with (i) CSSF Regulation No. 16-07 relating to out-of-court complaint resolution, (ii) CSSF Circular 18/698 on authorisation and organisation of investment fund managers incorporated under Luxembourg law and (iii) CSSF circular 19/718 on the adoption of the Guidelines on complaints-handling for the securities (ESMA) and banking (EBA) sectors of 4 October 2018 (to the extent applicable), BC Partners Management Sà r.l. (BCPM) has established and implemented effective and appropriate procedures for the reasonable and prompt handling of complaints received from its clients, i.e. any AIF managed by BCPM acting as an Alternative Investment Fund Manager, any AIF's investor and any client to whom BCPM provides MiFID services, including separately managed accounts services (the "**Complainants**").

This policy applies to BCPM, including branches, representative office and subsidiaries, if any, in its capacity of the AIFM of AIFs or discretionary portfolio manager for segregated mandates on-boarded on a case-by-case basis.

2. Definition of a complaint

A "complaint" within the meaning of CSSF Regulation No. 16-07 is defined as a complaint filed with a professional to recognize a right or to redress a harm.

A complaint can be made by phone or in writing (post or email) and addressed to the designated Complaints Officer within BCPM, as defined below. The Complainant shall explain in detail the facts behind the complaint, providing all relevant supporting documentation if applicable.

3. Complaints Handling Procedure

The complaints officer in charge of handling complaints received by BCPM is the conducting officer in charge of the compliance function of BCPM, Stephanie Sion (the "**Complaints Officer**").

Address: BPCM registered office: 18 rue Erasme, L-1468 Luxembourg

E-mail: compliance@bcpartners.com

The Complaints Officer is responsible for the implementation of the Complaints Handling Policy and for the efficient operation of the internal procedure for complaints handling. BCPM shall ensure that its officers and employees promptly notify the Complaints Officer of any complaint received for investigation and resolution.

BCPM will acknowledge receipt of the complaint in writing within ten (10) business days of receipt informing the Complainant that his/her complaint is being considered and providing him/her with an estimated timetable for handling the complaint.

BCPM will then provide a response within one calendar month from the receipt of the Complaint. Should the response not be made available within the prescribed period, the Complainant will be informed of the cause for the delay and with an indication of the date by which the investigation will be completed and a final response issued.

Upon receipt of a complaint, BCPM:

- (i) will seek to gather and to investigate all relevant evidence and information on each complaint;
- (ii) will provide an answer without undue delay and in any case, within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the Complainant was sent. Where an answer cannot be provided within this period, the compliance officer shall inform the Complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.
- (iii) will inform the Complainant on every step of the complaint resolution and attached communication.

Escalation to the Board:

If, after one month from the date when the complaint was originally sent to BCPM and despite BCPM's best efforts, the Complainant did not obtain an answer or a satisfactory answer at the level of the Complaints Officer, the Complainant may raise its complaint at the level of the board of managers of BCPM and more specifically to Pierre Stemper, whose contact details are as follows:

BC Partners Management S.à r.l.

18 rue Erasme, L-1468 Luxembourg

Email: Pierre.Stemper@bcpartners.com

Existence of the out-of-court complaint resolution at the CSSF

To the extent required by applicable regulations or circulars where the complaint handling by the Complaint Officer did not result in a satisfactory answer for the Complainant, the Complaints Officer shall, in addition to providing the Complainant with a full explanation of its position as regards to the complaint:

- (i) Inform the Complainant, on paper or by way of another durable medium, of the existence of the out-of-court complaint resolution procedure before the CSSF and send a copy of the CSSF Regulation 16-07 or the reference of the CSSF website (https://www.cssf.lu/wp-content/uploads/Formulaire-Reclamation_EN.pdf);
- (ii) Indicate to the Complainant the different means to contact the CSSF to file a request; and
- (iii) Inform the Complainant, on paper or by way of another durable medium, that he/she/it can file a request with the CSSF and that, in this case, his/her/its request with the CSSF must be filed with the CSSF within one (1) year after the filing of the initial complaint with BCPM.

If the case arises, BCPM will confirm its decision to have recourse to the out-of-court complaint resolution procedure to resolve the dispute and 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, to the Complainant.

4. Record

Records of all complaints will be kept by the Compliance Officer for five years and all complaints must be recorded in the Complaints Register maintained by the Compliance Officer.

5. Publication

The AIFM will publish the instruction how to make a complaint and reference to the CSSF website on the group website, to ensure easy access of information to the AIFs investors.

6. Reporting to the CSSF

BCPM will provide the CSSF with a comprehensive answer and cooperation within the context of the handling of complaints and requests.

On an annual basis, the Complaints Officer shall communicate to the CSSF a table including the number of complaints registered by BCPM, classified by the type of complaints, as well as a summary report of the complaints and of the measures taken to handle them.