

Reporting a complaint

Pramerica Management Company S.A. has implemented procedures for managing customer complaints in compliance with the requirements of CSSF Regulation 13-02 and CSSF Circular 17/671 as amended by CSSF Circular 18/698.

In accordance with CSSF Regulation N°13-02, a complaint shall mean a "complaint filed with a professional to recognize a right or to redress a harm". Thus, simple requests for information or clarification will not be considered as complaints. In this respect, any complaint must be sent to the attention of the Compliance Officer of **Pramerica Management Company S.A., 37/A, Avenue Kennedy, L-1855 Luxembourg.**

Pramerica Management Company S.A. will provide the complainant with a written acknowledgement of receipt within a period which shall not exceed 10 business days after receipt of the complaint, unless the answer itself is provided to the complainant within this period.

An answer will be provided within a period which will not 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 Company will inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

Pramerica Management Company S.A. informs its customers of the existence of the out-of-court dispute settlement procedure with the Commission de Surveillance du Secteur Financier ("the CSSF"), the Luxembourg financial services regulator.

Where a customer did not receive a response, or satisfactory response, within one month of a complaint being submitted to Pramerica Management Company S.A., the customer can refer their complaint to the CSSF.