



Jupiter Asset Management International S.A.

Complaints handling policy

This Policy applies to Jupiter Asset Management International S.A. and/or any of its subsidiaries and affiliates' (subsidiaries and affiliates - being those companies which have Jupiter Asset Management International S.A. as their ultimate parent company).

Policy Owner (Senior Manager/Board/Committee)	<i>Conducting officer in charge of complaints handling</i>
Frequency of Review	<i>at least annually</i>
Last Review	<i>September 2020</i>
Management Committee's approval	<i>29.09. 2020</i>
The board of directors' approval	<i>11.11. 2020</i>

1. OVERVIEW

1.1 PURPOSE

The purpose of this policy (the “**Policy**”) is to handle, with reference to the activities carried out by or on behalf of Jupiter Asset Management International S.A. (referred to as the “**Company**” or “**JAMI**”), including activities carried out by a delegate, sub-delegate or counterparty, any complaints received in relation to JAMI, its delegates, or the funds under JAMI’s management (the “**Funds**”).

1.2 SCOPE

This Policy applies to all levels without restriction of all employees of the Company (including those of the branches of the Company) (together referred hereinafter as the “**Employees**”), to JAMI’s conducting officers and the members of JAMI’s board of directors (the “**Directors**”) and to all service providers acting for or on behalf of the Company, to ensure full compliance with laws, regulations, rules and professional standards.

1.3 RESPONSIBILITY

It is the responsibility of all Employees to undertake their role within the Company having regard to the Company’s and Jupiter’s policies and procedures concerning the complaint handling. Failure to observe these requirements endangers the interests of the Company and Jupiter’s clients and exposes the Company and Jupiter to potential legal and regulatory censure and Employees to both potential internal and external disciplinary action.

In the event Employees are concerned that the Company’s requirements regarding the complaints handling are being breached they should report the matter to the Company’s conducting officer in charge of compliance and the Management Committee (as defined below) immediately.

1.4 ACCOUNTABILITY

This Policy is administered by the conducting officer in charge of complaints who is responsible for the day-to-day oversight of this Policy. The JAMI’s management committee (the “**Management Committee**”) and the Directors are accountable for this Policy. This Policy and any amendments must be approved in writing by the Management Committee.

1.5 GOVERNANCE

This Policy is subject to an annual review by the Company’s conducting officer in charge of the complaints handling.

2. THE POLICY

2.1 THE POLICY

2.1.1 JUPITER GROUP

Collectively known as “**Jupiter**”, the Jupiter group (whose parent company is Jupiter Fund Management plc, based in the United Kingdom) includes two FCA regulated entities; Jupiter Asset Management Limited (“**JAM**”) and Jupiter Unit Trust Managers Limited (“**JUTM**”), and one CSSF regulated entity, JAMI.

Jupiter operates a common approach across the group in relation to the complaints handling.

2.1.2 Handling of Complaints

A complaint is as any type of dissatisfaction expressed by the client¹ in relation to the Funds or the activity of the Company, as further defined in CSSF regulation 16-07, CSSF circular 17/671 and CSSF circular 18/698, as may be amended from time to time.

¹ Pursuant to Article L. 010-1 of the Luxembourg’s Consumer Code, any natural person who acts for purposes which are outside his/her commercial, industrial, artisanal or professional activity. This shall include, but is not limited to, an investor of the Funds, the Company’s supplier.



All complaints must be and handled and forwarded to a member of the Management Committee, appointed by the Company, and notified to the CSSF as the person in charge of the customer complaint handling process (“**Complaints Handling Officer**”).

The Complaints Handling Officer is responsible for ensuring that JAM and J.P. Morgan Bank Luxembourg S.A. (“**JPM**”), acting as the depositary, the fund administrator and as the registrar and transfer agent of the Funds, bring to the Company’s attention all Complaints which are brought to JAM and JPM attention.

The Complaints handling in relation to the Funds have been delegated to JPM.

The Complaints Handling Officer will gather the relevant information from the relevant parties, necessary to assess and address the Complaint in an accurate manner.

In case the Complaint relates to the services rendered by JAM or JPM in relation to the Funds, the Complaints Handling Officer must forward this complaint to JPM.

The Complaints must be recorded in the register of the complaints (“**Register**”) by the Complaints Handling Officer.

The Complaints Handling Officer must ensure that each Complaint as well as each corrective measure taken to handle it, are properly registered in the Register.

2.1.3 Submission of complaint

Any Complaints should be submitted to the JPM’s office at 6 route de Trèves, Senningerberg L-2633 Luxembourg or by telephone +352 46 26 85 973 or fax +352 22 74 43 or email talux.funds.queries@jpmorgan.com and JPM will respond to any enquiry or complaint.

2.1.4 Follow-up on the Complaints

The Complaints Handling Officer must analyse on a regular basis all data relating to the Complaints in order to detect and prevent any recurring or systemic problem, as well as any potential legal or reputational risk, in particular:

- by analysing the features of the Complaints in order to identify the root causes common to some complaints;
- by considering whether these root causes may also affect other processes of the Company, including those to which the Complaints do not relate directly.

If deemed necessary by the Complaints Handling Officer, an action plan must be designed by the latter and implemented by the relevant department of the Company in order to prevent the occurrence of situations similar to those which caused a particular Complaint in the first place.

2.1.5 The Complaints Handling Officer

In accordance with the relevant provisions of the CSSF Circular 18/698, as may be amended from time to time, the Company has appointed the Complaints Handling Officer.

At the time of issue of this Policy, the conducting officer responsible for the compliance function, who is also the Company’s compliance officer, has been appointed by the Company’s board of directors (the “**Board of Directors**”) as the Complaints Handling Officer.

The Complaints Handling Officer is mainly in charge of:

- coordinating the handling of the Complaints addressed to JAM and JPM based on a commonly agreed upon complaints handling process;
- dispatching the Complaints received directly by the Company to JAM or JPM, respectively, if related to portfolio management issues or operational issues;
- making sure that the members of the Management Committee and the Board of Directors obtain information on an on-going basis about the Complaints.



2.1.6 Information to the Management Committee

The Complaints Handling Officer shall inform the Management Committee of the Complaints received, including suggestion for the Complaint's resolution/mitigating factors, exercised follow-up etc., at least on monthly basis.

2.1.7 Information to the Board of Directors

The yearly report of the compliance function report, which is submitted by the conducting officer responsible for this function to the Board of Directors at one of its quarterly meetings, must include an account of the total number of Complaints received in the course of the previous calendar year and of their handling.

2.1.8 Reporting to the CSSF

On an annual basis, the Complaints Handling Officer must submit to the CSSF a table detailing the total number of the Complaints received, their nature, listed by categories, as well as a summary report of their handling and of the corrective measures taken.

2.2 NON-COMPLIANCE

Consequences of non-compliance, to the extent applicable to the Policy, may result in disciplinary action or dismissal.

2.3 RELEVANT LAWS/REGULATIONS

This Policy conforms to the regulatory standards set by the CSSF in the CSSF circular 18/698 relating to the *Authorisation and organisation of investment fund managers incorporated under Luxembourg law* as may be amended from time to time, CSSF Regulation N° 16-07 relating to *out-of-court complaint resolution*, and CSSF circular 17/671 relating to *Specifications regarding CSSF Regulation N° 16-07 of 26 October 2016 relating to out-of-court complaint resolution* as may be amended from time to time, and any other relevant laws, circulars and regulations.

3. ADDITIONAL INFORMATION

3.1 BREACH GUIDANCE

In the event of a breach or potential breach of this Policy, an employee must inform the compliance function.

3.2 INTERNAL REFERENCES

This Policy should be read in conjunction with the Jupiter's complaints policy.

3.3 INTERNAL/EXTERNAL PUBLICATION

This Policy will be published internally.
It is not for external distribution.

APPENDIX

Lp	Date	Author	Description	Approver	Date
1	February 2019	Dermot Mulvin	Conflicts of interest policy	Management Committee	25.02.19
2	September 2019	Kasia De Oliveira Santos	Update with new Jupiter template	Management Committee	05.09.19
3	September 2020	Kasia De Oliveira Santos	Modalities for submission of complaints, legal references	The Board	11.11.20

