

# Vistra Fund Management S.A. - Complaints Handling Policy – Information for Clients

## About Vistra

Vistra Fund Management S.A. (“VFM”) is the Luxembourg-based third party alternative investment fund manager (“AIFM”) of Vistra Group who is authorised to act as AIFM to private equity, real estate, infrastructure, fund of funds and private debt alternative investment funds (“AIF”).

## Our Terms of Business

It is important to us that our clients are receiving a professional, high level of service. If we are not meeting your expectations we ask that you let us know as soon as possible. We are committed to working with you to resolve any issue identified.

## Dealing with Complaints

We set out below how Vistra will deal with any complaint it receives and the timeframes within which we will respond to you.

A director of Vistra Fund Management S.A. shall supervise the services provided in respect of each customer. Accordingly, if any matters arising from, or in connection with, the provision of our services give any cause for concern, these should be addressed, in the first instance, to the director responsible for the provision of the services you are receiving.

If the matter raised with the director is not resolved to your satisfaction, a complaint may then be addressed, in writing, to Vistra’s Complaint Officer. Vistra is committed to handling complaints diligently and in a competent, transparent and impartial manner.

## Complaints Process

We will treat any expression of dissatisfaction you raise with us, which has not been satisfactorily resolved by the director responsible (by the end of the business day following receipt) as a complaint. If you:

- Have sent your complaint by courier to us addressed to the Complaint Officer.
- Wish to email or write to us we request you address your email to the Complaint Officer.

Contact details:

- Email: [complaints-vfm@vistra.com](mailto:complaints-vfm@vistra.com)
- Address:

Vistra Fund Management S.A  
16, Rue Eugène Ruppert  
L-2453 Luxembourg  
G.D. Luxembourg

In the event the Complaint Officer is out of the office an alternate director will respond on their behalf.

In both scenarios, we will try our best to resolve the complaint. We will write to acknowledge your complaint (within 10 working days of receiving your complaint) and will provide you with a copy of this Complaints Handling Policy document. Our letter will advise you who will be managing the complaint, will confirm that your complaint is being considered and will inform you that you may next expect a further letter within one month (of receiving your complaint).

Our investigation of any complaint will be conducted fully and fairly by an appropriate party within Vistra. Any investigation will be undertaken with impartiality and in a competent and diligent manner. If your complaint involves a matter concerning a particular employee, we will ensure that employee will not take any part in investigating and assessing your complaint.

### **Resolution of Your Complaint**

We may:

- Write to you to seek further information and, if we do, we will provide another date by which you will next expect to receive communication from us.
- Offer you a meeting, where we consider this to be appropriate. If a meeting is held we will follow up in writing.

We will keep you informed about the progress of your complaint, including details of any actions we are taking to resolve the complaint.

Where we require further time to investigate your complaint you will receive written communication setting out why further time is required and when you may next expect us to communicate with you.

Once our investigation of your complaint has concluded you will receive a formal written response. If applicable, we will specify any action that we are proposing to take, or have already taken, to resolve the complaint.

We will aim to send you our final response as soon as possible, within the timescales set out in our letters or as agreed with you. We hope to conclude your complaint within three months of receiving your complaint, unless we have agreed with you otherwise.

We hope our final response to you will conclude the matter to your satisfaction. Our final letter will advise you that we will consider the matter closed unless you notify us to the contrary within eight weeks.

### **If You Are Still Not Satisfied**

If our resolution of your complaint does not meet your expectations please let us know. Should you wish to appeal your complaint and/or our handling of it, please write a letter addressed to the Managing director.

### **Complaints to the Regulator**

We aim to resolve your dissatisfaction with any part of our service offering and hope to continue our good working relationship. However, if your complaint remains unresolved, you are not satisfied with our final response or the way in which we have handled your complaint, you may contact our regulator, the CSSF.

You may find the following link of assistance if you wish to register a complaint with the JFSC: <https://www.cssf.lu/fr/reclamations-clientele/>