

# **Complaints Handling Policy**

Swiss Life Asset Managers Luxembourg

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## **1. Purpose**

Swiss Life Asset Managers Luxembourg is required to implement and maintain efficient and transparent procedures for handling and investigating complaints. In the light of this regulatory background, the purpose of this document is to provide clear, comprehensible, precise and up-to-date information on the complaint handling procedure of Swiss Life Asset Managers Luxembourg. Furthermore, this document informs about the out-of-court complaint resolution procedure at the CSSF (Commission de Surveillance du Secteur Financier) as the Luxembourg Supervisory Authority for the Financial Sector.

The complaint handling procedure is intended to ensure that complaints are dealt properly and promptly. Swiss Life Asset Managers Luxembourg ensures objectivity in dealing with Complaints and the serious consideration of the concerns of the complainants aiming on their fair treatment. Potential conflict of interests shall be identified and mitigated in accordance with the Conflict of Interest Policy of Swiss Life Asset Managers Luxembourg.

A complaint is deemed to be any expression of dissatisfaction by an investor or potential investor. The complaint may be in respect of any aspect service, marketing, administration (initial or on-going), sales process, or any other aspect of Swiss Life Asset Managers Luxembourg, its subsidiaries or branches.

The procedure for handling complaints is made available to Complainants free of charge.

## **2. How to complain**

The Complainant shall address a complaint in writing (“Complaint Letter”) indicating:

- First and last name
- Contact details

The “Complaint Letter” shall describe in detail the full case history, the facts from which the complaint originates and shall encompass all necessary supporting documents.

Complainants may file complaints in the official language or one of the official languages of their Member State.

### 3. To whom a complaint should be addressed

The Complainant may address the complaint in first instance by sending the “Complaint Letter” to:

By E-Mail            info-lux@swisslife-am.com

By Letter            **Swiss Life Asset Managers Luxembourg**  
4a, Rue Albert Borschette  
L-1246 Luxembourg  
Grand Duchy of Luxembourg

Attention to        Compliance Department

By Telephone       + 352 267 855 – 0

### 4. Responsible Person

The responsible person in the first instance is the “Complaint Handler” in charge of the complaint. If the complaint handling in the first instance did not result in a satisfactory answer for the Complainant, the written answer from Swiss Life Asset Managers Luxembourg will mention the contact details of the person responsible at management level, giving to the Complainant the opportunity to raise the complaint to the management of Swiss Life Asset Managers Luxembourg.

### 5. Timing of the procedure

Swiss Life Asset Managers Luxembourg acknowledges in writing the complaint or answers in writing to the Complainant with undue delay but latest within 10 (Luxembourg) business days from receipt. In both cases, Swiss Life Asset Managers Luxembourg will inform the Complainant of the name and contact details of the person in charge of the complaint (“Complaint Handler”).

Swiss Life Asset Managers Luxembourg provides the Complainant with an answer within one month from the date of receipt of the Complaint. Where Swiss Life Asset Managers Luxembourg considers that this time frame will be exceeded, the Complainant will be informed of the causes of the delay and Swiss Life Asset Managers Luxembourg will indicate the date on which the file examination is expected to be completed.

## 6. CSSF out-of-court resolution of complaints

Where the complaint handling at the level of the “Complaint Handler” did not result in a satisfactory answer for the Complainant, Swiss Life Asset Managers Luxembourg provides the Complainant with a full explanation of its position. Swiss Life Asset Managers Luxembourg will in-form the Complainant of the out-of-court complaint resolution procedure at the CSSF.

A non-satisfied Complainant can file a request with the CSSF under adherence of the cumulative conditions set by the Regulator (<https://www.cssf.lu/en/customer-complaints/>) within one year after the Complainant has filed the Complaint, either:

- by mail (simple mailing, no registered letter required) to the following address:  
Commission de Surveillance du Secteur Financier  
Département Juridique CC  
283, route d’Arlon  
L-2991 Luxembourg
- or by email to the following address: [reclamation@cssf.lu](mailto:reclamation@cssf.lu).

The CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints as well as the complaint filing form of the CSSF can be found on the following sites:

Complaint filing form of the CSSF	<a href="https://www.cssf.lu/en/customer-complaints/">https://www.cssf.lu/en/customer-complaints/</a>
CSSF Regulation N° 16-07 relating to the out-of-court resolution of complaints	<a href="https://www.cssf.lu/wp-content/uploads/RCSSF_No16-07eng.pdf">https://www.cssf.lu/wp-content/uploads/RCSSF_No16-07eng.pdf</a>
CSSF FAQ	<a href="#">FAQ relating to customer complaints – CSSF</a>