

GUIDELINES FOR HANDLING COMPLAINTS

To whom the procedure applies

This procedure describes the handling of complaints from non-professional clients to the legal entity Swiss Life Asset Managers Transactions AS ("SLAM Transactions AS") or to the legal entity Swiss Life Asset Managers Funds AS ("SLAM Funds AS").

The framework for handling customer complaints follows from EU/2017/565 Article 26

[Delegated regulation - 2017/565 - EN - EUR-Lex \(europa.eu\)](#)

See also [Finanstilsynets rundskriv 4/2019 - Retningslinjer for klagebehandling i bank-, finans-, forsikrings- og verdipapirverksemd.](#)

Complaint handling function

The compliance function is the company's complaints handling function. The function shall maintain the company's complaints register, process the complaints received, communicate with complainants, authorities, board of appeal and advisors, and identify and assess compliance risks or systematic problems uncovered in connection with the processing of complaints.

Procedure for handling complaints

Complaints can be sent by post, email or delivered to our office during our opening hours.

E-mail address: SLAMNO-compliance@swisslife-am.com

Postal address: Swiss Life Asset Managers Nordic, P.O. Box 1207, 0110 Oslo, Norway

Visiting address: Haakon VII's gt 1, 0161 Oslo

Upon receipt of customer complaints in writing, these shall immediately be submitted to the Compliance function for further follow-up. In the case of verbal complaints, the person receiving the enquiry shall endeavor to clarify whether the customer in question wishes to submit a complaint. If the customer needs assistance in formulating the complaint, the relevant employee in SLAM Transactions AS or SLAM Funds AS shall provide the necessary assistance.

Complaints received shall be registered in a separate register. The following is stated in the register:

- Date of receipt
- Identity of the complainant
- Brief description of the content of the complaint
- Date of most recent response
- Brief description of the content of the response.
- Whether the board has been informed.

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- Whether legal assistance is sought
 - Whether the matter is considered resolved.

The customer shall receive confirmation that the complaint has been received and processed no later than one week after receipt. The confirmation shall state the expected processing time and the possibility of having the complaint heard by a complaints committee.

An overview of relevant board of appeal and the complainant's opportunity to take the case to court is described on the Financial Supervisory Authority's website: [Klageordninger - Finanstilsynet.no](https://klageordninger.finanstilsynet.no)

Further follow-up shall take place without undue delay.

All documentation relating to the complaint shall be archived and retained for five years after the complaint process has been finalized.

Reporting to the Board of Directors

The Board of Directors shall receive a report on complaints received, as well as the status of individual complaints that have not been finalized at each Board meeting.

Reporting to the Financial Supervisory Authority of Norway

The Company shall report annually on customer complaints on a form stipulated by the Financial Supervisory Authority of Norway. The report shall include the number of complaints received, the outcome of the complaint handling, and cases under consideration by the complaints body.

Duration

The guidelines for handling customer complaints are reviewed every year and is applicable until it is amended.

This is a translation of the Norwegian version of the guidelines. In case of any discrepancies between the two or misunderstandings of interpretation, the Norwegian version prevails.