

STOREBRAND SICAV



Registered Office:
6, rue Lou Hemmer, L-1748 Senningerberg, Grand Duchy of Luxembourg
RCS B234106

Complaints Handling Policy

Adopted by the Board of Directors

Version	Date	Status	Prepared
1.0	07/05/2019	Draft	GP

1. GENERAL

Storebrand SICAV S.A. is a *Société d'Investissement à Capital Variable* ("Storebrand SICAV" or the "Fund"), with its registered office at 6 rue Lou Hemmer, Senningerberg Luxembourg, and subject to Part I of the 2010 Law. The Fund currently operates seven sub-funds:

- Storebrand Global Solutions Lux
- Storebrand Global ESG Plus Lux
- Storebrand Global Multifactor Lux
- Skagen Kon-Tiki Lux
- Skagen Focus Lux
- Skagen Global Lux
- Skagen m2 Lux

The following parties have been appointed:

Function	Party
Management Company	Fundrock Management Company S.A. 33 rue de Gasperich, L-5826 Hesperange, Luxembourg
Depositary Bank	Northern Trust Global Services SE 6 rue Lou Hemmer, Senningerberg, Luxembourg
Central Administrator, Corporate-, Transfer-, and Domiciliary Agent, Registrar	Northern Trust Global Services SE 6 rue Lou Hemmer, Senningerberg, Luxembourg
Investment Managers	Storebrand Asset Management Prof. Kohts vei 9, 1366 Lysaker, Norway Skagen AS PO Box 160, Stavanger N-4001, Norway
Global Distributor	Storebrand Asset Management Prof. Kohts vei 9, 1366 Lysaker, Norway
Auditors	PricewaterhouseCoopers, <i>société cooperative</i> . 2, rue Gerhard Mercator, L-2182 Luxembourg
Legal	Elvinger Hoss Prussen <i>société anonyme</i> 2, Place Winston Churchill, L-1340 Luxembourg

The following are the most relevant Laws and Regulations

- The CSSF regulation N° 13-02 of 15 October 2013 relating to the out-of-court resolution of complaints (the "**CSSF Regulation**");
- The CSSF circular 14/589 providing details concerning CSSF Regulation (the "**CSSF Circular**"), the Board of the Fund has adopted the following Complaints Handling Policy ("the Policy");
- Article 15 of CSSF Regulation 16-07 and more recently the CSSF Circular 18/698.

2. SCOPE

This Policy aims to i) implement an appropriate internal framework, ii) define internal responsibilities and instructions for the receipt and the handling of Complaints and iii) ensure that they are handled in a manner which is fair and objective. The Policy was first approved by the Board (Date) after which

it was distributed amongst the parties referred to under 1. This Policy may be provided to any interested party upon request.

3. DEFINITIONS

Complainant means any natural or legal person, such as a customer of the Fund, an investor, former investor, or actively solicited potential investor, having submitted a Complaint.

Complaint means any written complaint filed with or addressed to the Fund, its Board, the promotor or the Transfer Agent in the form as described under item 7.1 below.

4. COMPLAINTS HANDLING OFFICER

Mr. Garvan Rory PIETERS, independent Board member, has been designated as responsible for the implementation and execution of the Policy in compliance with the relevant CSSF Regulation and Circular. He is also the point of contact for the CSSF and as such **“the Complaints Handling Officer”**.

5. INTERNAL PROCEDURE

A Complaint may be received by any of the parties as mentioned under 1, with whom this policy has been shared. Parties are committed to forward Complaints to the Complaints Handling Officer (7.2). All Complaints shall be recorded promptly by the recipient and the Complaints Handling Officer in the Complaints Register. The Register shall include the information described under item 8.

6. COMPLAINANT INFORMATION

Any Complainant can request information from the Fund. This right is free of charge. Complainants will upon request be provided with this Policy containing information on how a Complaint may be lodged and the procedure that should be followed. Complaints should be lodged in writing at the address below:

Contact details: Storebrand SICAV (p/a Central Administrator)
Attention: Complaints Handling Officer
Address: Northern Trust Global Services SE
6 rue Lou Hemmer,
L-1748 Senningerberg
Grand Duchy of Luxembourg
eMail: complaints@storebrandfunds.com

Complainants should be lodged in the English Language.

7. HANDLING of COMPLAINTS

7.1 Complaint filing

All Complaints are expected to be filed in writing addressed to the attention of the Complaints Handling Officer with the reference “Complaint” at the address or e-mail defined above in section 6. Only written complaints outlining the reasons for the Complaint and the resulting alleged damage or loss in relation thereof, if applicable, will be deemed as a valid Complaint for the purpose of the Policy.

Simple information requests as well as expressions of dissatisfaction about circumstances of minor significance that may be resolved by an initial contact or by a direct corrective measure are not regarded as Complaints.

7.2 Complaint reception

The Complaints Handling Officer is in charge of the management of Complaints. All written Complaints, which are not directly addressed to the Complaints Handling Officer (e.g. Transfer Agent, distributor, promotor etc.), should be forwarded to the Complaints Handling Officer without delay.

7.3 Responding to the Complainant / Acknowledgement of receipt

The Complaints Handling Officer shall reply in writing to the Complainant within ten (10) business days after the receipt of the Complaint. In case an answer cannot be provided within this period, a receipt of acknowledgment shall be sent by the Complaints Handling Officer within ten (10) business days after the receipt of the Complaint. Such acknowledgment of receipt should contain the name and contact details of the person in charge and an indication of when an official response to the complaint can be expected. In any event, a response must be provided to the complainant within a period of not more than one (1) month from the date of receipt of the Complaint and such a period shall be stated in the receipt of acknowledgment. If a response cannot be provided within the one-month time frame, the Complaints Handling Officer shall inform the Complainant in writing of the reason(s) of the delay and indicate the date on which an answer is likely to be given.

7.4 Registration and information

All Complaints shall be registered by the Complaints Handling Officer in the Complaints Register (appendix 1). The Complaints Register is maintained in electronic format in a folder accessible only by the Complaints Handling Officer and will be shared with the Board of Directors.

If the Complaint has a material impact (financial and or reputational) and/or has to be forwarded to the Regulatory authority (CSSF), the Complaints Handling Officer shall inform the Board of Directors without delay. The reply to be given to such Complaints shall be approved by the Board of Directors.

The Complaints Handling Officer shall share the Complaints Register on a quarterly basis with the Board of Directors of the Fund, with the mention of problems identified, the corrective measures taken and any follow-up actions on these measures.

7.5 Assessment

The Complaints Handling Officer shall seek to gather all relevant information that is necessary and investigate each Complaint, as soon as it is received.

7.6 Existence of the out-of-court complaint resolution at the CSSF

Where the complaint handling did not result in a satisfactory answer for the Complainant, the Complaints Handling Officer shall:

- provide the Complainant with a full explanation of its position as regards the Complaint;
- inform the Complainant of the existence of the out-of-court complaint resolution procedure before the CSSF and send a copy of the CSSF Regulation (or CSSF website); and
- Indicate to the Complainant the different means to contact the CSSF to file a request.
 - <http://www.cssf.lu/en/consumer/complaints/>
 - reclamation@cssf.lu
 - Tel.: (+352) 26251-2574 or (+352) 26251-2904 Fax: (+352) 26251-2601

8. DOCUMENTATION, FILING and REPORTING of COMPLAINTS

Complaints shall be documented in a Complaints Register by the Complaints Handling Officer and should include the following information:

- Date of the Complaint;
- Name of the Complainant;
- Type of the Complaint;
- Summary of the Complaint;
- Summary of corrective measure(s) (specifying any compensation);
- Remarks concerning the need to follow up and suggestions, if any, on possible procedural improvements.

Once a Complaint has been dealt with and closed, a report and all documents relating to the Complaint shall be registered in the Complaints Register, including all written communication with the Complainant such as, email, fax messages, letters, etc. Notes shall also be made in the Complaints Register regarding date and time of telephone calls with the Complainant regarding the Complaint. All received, handled and closed Complaints shall be electronically archived. The length of time that the matter remains filed shall be based on its nature. However, all Complaints shall remain on file for at least five (5) years. The Complaints file and the register shall be kept at the Fund's registered Office.

Pursuant to the CSSF Circular 18/698, the Complaints Handling Officer shall file on an annual basis (within five months following the financial year-end of the Company) with the CSSF, covering the previous calendar year, a table including the number of complaints registered, classified by type of complaints, as well as a summary report of the complaints and of the measures taken to address the Complaints.

COMPLAINTS REGISTER

Date received	Name of the Complainant	Type of Complaint	Complaint summary	Summary of Corrective Measures	Compensation (if any)	Comments