

# GREEN ARROW CAPITAL AIFM SARL

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## Complaint handling Policy

## Document History

VERSION	DATE	DESCRIPTION	AUTHOR	REVIEWER	APPROVAL
01	22/01/2025	Document creation	Conducting Officer	Conducting Officer	Board of Directors

**Green Arrow Capital AIFM SARL | 3 Rue de Turi L-3378 Livange | Luxembourg**

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## I - GLOSSARY

<b><u>ABBREVIATION</u></b>	<b><u>MEANING</u></b>
<b>Board</b>	The Board of Directors of GREEN ARROW CAPITAL AIFM SARL
<b>CSSF</b>	<i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg financial supervisory authority
<b>GREEN ARROW AIFM or Company</b>	GREEN ARROW CAPITAL AIFM SARL which is a management company authorised under the law of 13 July 2013 (the “AIFM Law”)

## II - ABOUT THIS DOCUMENT

In accordance with the Article 15 of CSSF Regulation No.16-07, CSSF Circular 18/698 and CSSF Circular 17/671, every management company must implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from investors. The objective of this policy is to ensure that complaints received for the attention of the Company or the funds it manages are dealt with professionally, efficiently, consistently and in compliance with the laws, regulations and circulars (the **"Complaint handling Policy"**).

## III - COMPLAINT HANDLING POLICY

### 1. Responsible person

The Company has designated a conducting officer - Mr. Alberto Cavadini - as the responsible person for the handling, centralisation and monitoring of complaints (the **“Conducting Officer”**). In accordance with the Article 15(3) of CSSF Regulation No.16-07, such conducting officer may delegate internally the complaint management. Mr Alberto Cavadini internal delegate for complaint management is Ms. Cedomirka Juris (the **“Delegate”**).

The identity of the conducting officer responsible for complaints handling and of his internal delegate have been communicated internally and to the CSSF.

The Conducting Officer has the responsibility of informing other employees of the Company of the internal complaint handling procedures.

### 2. Procedure

#### 2.1 Eligibility

A physical or legal person is eligible to file a complaint if:

- he/she/they is/are or has/have been an investor of the funds managed by the Company and
- the complaint is relevant to the investor being or having been an investor of one of these funds.

A complaint can be brought on behalf of an eligible complainant, or a deceased person who would have been an eligible complainant, by the person authorised by the eligible complainant or by law.

Furthermore, the Company will deal with complaints that have been forwarded to it by the CSSF.

#### 2.2 Form of a complaint

A complaint may be made by mail or email to

M. Alberto Cavadini  
Email: [Complaints@greenarrow-capital.lu](mailto:Complaints@greenarrow-capital.lu)  
Address: 3 Rue de Turi, L-3378 Livange, Luxembourg

### **2.3 Acknowledgement of receipt and update**

When an investor submits a complaint, the Company will send him a written acknowledgement of receipt of the complaint and/or bring an answer within five business days.

Each complainant must be informed of the name and contact details of the person in charge of his/her file.

At the one month after the acknowledgement letter, an update or response must be provided to the complainant.

### **2.4 Investigation**

The investigation must be handled without delay. Each complaint must be analysed in order to identify the reason for the complaint and to determine responsibilities. The Company will seek to gather all relevant evidence and information.

### **2.5 Answer and resolution**

An answer and possible resolution must be presented in writing to the complainant. The answer must be signed by the Conducting Officer in charge of the complaint handling.

The answer must be provided without undue delay and in any case, within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the complainant was sent. Where an answer cannot be provided within this period, the Company must inform the complainant of the causes of the delay and indicate the date at which the resolution is likely to be achieved.

Where the complaint handling does not result in a satisfactory answer for the complainant, a full explanation on the position of the Company regarding the complaint must be given in writing. Furthermore, the complainant must be informed in writing of the existence of the out-of-court complaint resolution procedure at the CSSF and a copy of the relevant CSSF regulation must be sent to him or a reference to the CSSF website, as well as the different means to contact the CSSF to file a request.

### **2.6 Closure of complaints**

A complaint can be closed if:

- the Conducting Officer has sent a final response or
- the complainant has positively indicated acceptance of the Company's earlier response or
- the complainant has failed to revert to the Company within 8 (eight) weeks of the most recent letter from the Company, in which case a letter must advise that the Company has not received a response to earlier letters sent by the Company and the complaint has been closed or
- the complainant has contacted the Company to confirm that the complaint is dropped, in which case a letter will be sent by the Company confirming that the complaint has been closed on the instructions of the complainant.

### **2.7 Records and complaints register**

All complaints received must be registered in the complaints register. All measures taken for the resolution of a complaint and how it was resolved shall be recorded in the complaints register.

### **2.8 Analysis of complaints**

The Conducting Officer shall analyse the data relating to the complaint handling on a permanent basis, in order to enable the identification and treatment of any recurring or systematic problem, as well as any potential legal and operational risks, for example:

- by analysing the causes of individual complaints in order to identify the root causes common to certain types of complaints;

- by considering whether these root causes may also affect other processes or products, including those to which the complaints do not relate directly; and
- by correcting these root causes, when it is reasonable to do so.

### **2.9 Quarterly report to the Board**

On a quarterly basis, the Conducting Officer informs the Board of Directors of the Company about complaints received and ongoing actions taken in order to solve them.

### **2.10 Yearly Report to the CSSF**

The Conducting Officer in charge of the complaint handling is responsible for sending an annual report to the CSSF in accordance with the CSSF Circular 18/698 indicating the number of complaints filed by the investors, classified by type of complaints, as well as a synthetic report of the complains sand the measures taken to handle them. The reason of the complaints and the progress made in handling them should also be indicated. This report can be integrated into the compliance report mentioned in the CSSF Circular 18/698. The report will be sent at the latest five months after the ordinary general meeting that approves the annual accounts of the Company.

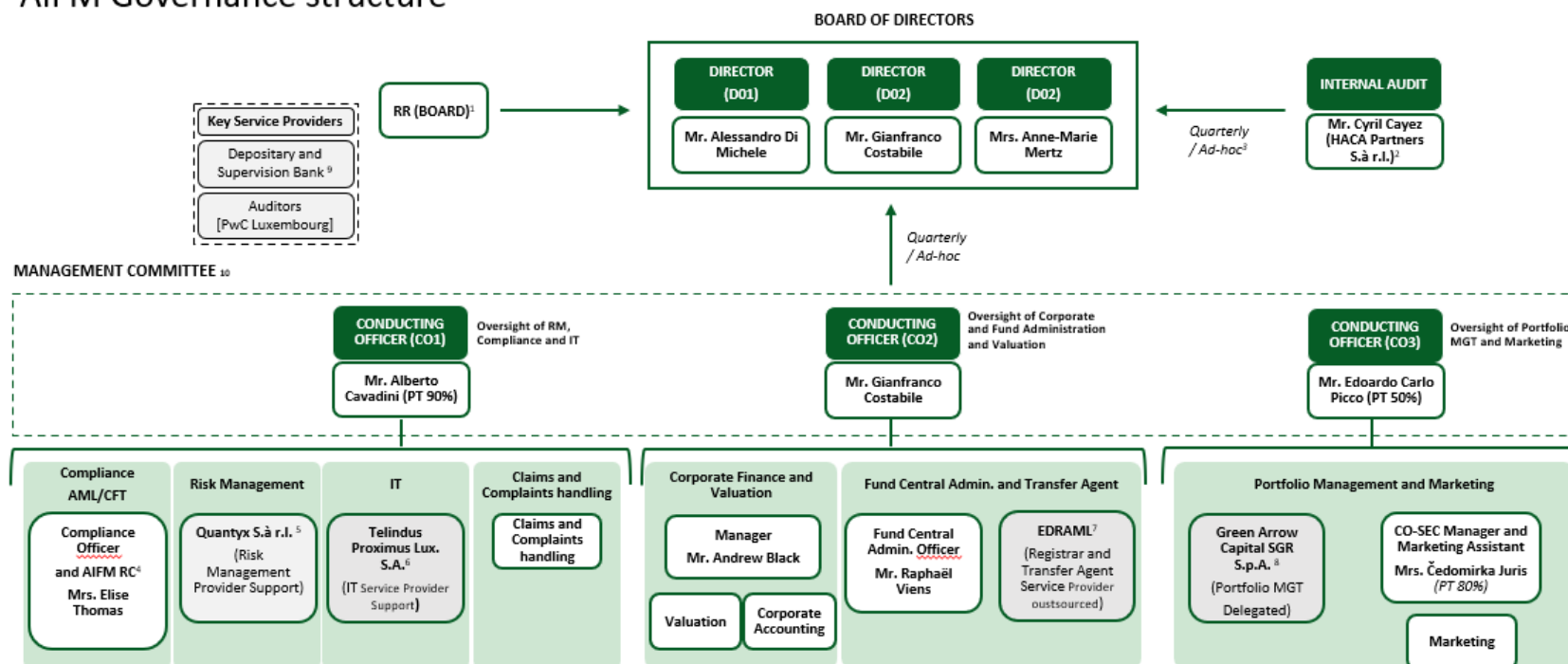


## IV - APPENDIX 1 – ORGANIZATIONAL CHART OF THE AIFM

## Organizational Chart of the AIFM

**PROPOSED STRUCTURE** (document updated on December 3, 2024)

### AIFM Governance structure



<sup>1</sup> RR: Responsable du respect des obligations.

<sup>2</sup> Internal Audit – Delegation: HACA Partners S.à r.l.

<sup>3</sup> The Internal Audit function is independent (and is supervised) by reporting directly to the Company's Board of Directors.

<sup>4</sup> RC: Responsable du contrôle du respect des obligations.

<sup>5</sup> Risk Management: The function will be supported by Quantyx S.à r.l. (Risk Management Support);

<sup>6</sup> IT – Service Provider Support: Telindus - Proximus Lux. S.A.

<sup>7</sup> Registrar and Transfer Agency – Delegation: Edmond de Rothschild Asset Management (Luxembourg) S.A. also in charge of first level AML/CFT controls

<sup>8</sup> Portfolio Management: – Full Delegation: Green Arrow Capital SGR S.p.A.

<sup>9</sup> Depositary: Edmond de Rothschild (Europe) S.A.

<sup>10</sup> The Management Committee will oversee the internal audit function and delegation arrangements in relation to internal audit.