

## 1. Introduction

At Aviva Investors (“AI”) we highly value the interests of our investors and always aim to deliver the best and most efficient services and outcomes to our investors. In line with our core values we have implemented robust complaints handling processes and procedures to ensure that any concerns or expressions of dissatisfaction (hereafter “complaint”) are treated in a fair manner.

We want to encourage our investors to express any complaints in relation to their investment or potential investment into a fund managed by AI and regard every complaint as opportunity to strengthen our processes and procedures and thus improve investor outcomes.

Whilst there is neither an existing exhaustive list of complainants or complaints nor a defined method of the recognition of complaints, it is considered that the opinion of each investor should be listened to and treated with particular care.

## 2. Complaints Handling

Complaints may be submitted free of charge by letter, email or fax, in English or in the official language(s) of the complainant’s Member State, to:

Aviva Investors Luxembourg  
Compliance Department  
2, rue du Fort Bourbon  
L 1249 Luxembourg  
Grand Duchy of Luxembourg  
Phone: +352 40 28 20 1  
Fax: +352 40 83 58  
Compliance.lu@avivainvestors.com

or

RBC Investor Services Bank S.A.  
Attention: Shareholder Services  
14, Porte de France  
L-4360 Esch-sur-Alzette  
Grand Duchy of Luxembourg  
Phone: +352 2605 9328  
Fax: +352 2460 9918  
csaviva@rbc.com

AI considers investor complaints as serious matters that require the highest priority and generally sends out a response within 15 business days. However an acknowledgement of the complaint will be sent to the investor within 48 hours that includes as a minimum:

- the name, or job titles and contact details of the complaint owner who is handling the complaint and
- that it will be followed in due course by more substantive information.

When submitting a complaint, the investor should attempt to provide all available information regarding the respective case. If the information obtained about the complaint is not sufficient to provide a concluding response, AI may seek to contact the investor to obtain a further understanding of the circumstances of the complaint.

A formal written response will be provided within 15 business days. If it should become apparent that processing will take longer than 15 business days, AI will advise the client in writing and provide an explanation as to why the complaint could not be answered at this stage.

# Aviva Investors Luxembourg S.A. – Complaints Handling

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A complaint will only be closed when AI has communicated a response to the investor, addressing their issues.

In cases where a complaint cannot be resolved to the full satisfaction of the investor, AI will provide a full explanation to the investor and give the investor the opportunity to raise the complaint with the person responsible at senior management level.

Please be informed that investors may decide to take a different view. In such a case investors have the possibility to refer the matter to out-of-court resolution mechanism of the Commission de Surveillance du Secteur Financier ("CSSF") within one year after the complaint was filed with AI as described by CSSF Regulation 16-07. This regulation enables clients of Luxembourg financial institutions to involve the CSSF as a business mediator, at no cost to them. More information can be found on the dedicated CSSF website:

<http://www.cssf.lu/en/financial-consumer-protection-and-education/complaints/>