

# Complaints Handling Procedure

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## Complaints Handling Procedure

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**Version 1.0, March 2021**

# Complaints Handling Procedure

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## Contents

Definitions.....	1
Introduction.....	2
Article 1. Submission of a Complaint.....	2
Article 2. Handling of a non-written Complaint.....	2
Article 3. Handling of a Complaint by E-mail.....	2
Article 4. Administrative recording of Complaints.....	2
Article 5. Contact Information.....	3
Article 6. KiFiD (Klachteninstituut Financiële Dienstverlening).....	3
Article 7. Date of Effectiveness.....	3

### Versions history

Version	Status	Date	Author	Remarks
0.1	Draft	March 10 <sup>th</sup> , 2021	Thorsten Schulz	Complaints procedure in conjunction with the FFM Complaints Policy.

### Approval

Version	Date	Approval body	Approved version
<b>1.0</b>	10-03-2021	Board of Directors	0.1

# Complaints Handling Procedure

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## Definitions

Unless the context otherwise requires, the words and expressions below, which are written with a capital letter in this document, have the following definitions:

<b>BoD</b>	Board of Directors of the Manager;
<b>Client</b>	the natural or legal person who purchases or has purchased a financial service from the Manager, including persons who have indicated that they wish to purchase financial services from the Manager or other interested parties;
<b>Complaint</b>	any expression of dissatisfaction submitted to the Manager by a Client about products and/or services of the Manager;
<b>Complaints Committee</b>	Body of the Manager dealing with Client complaints. The Committee also handles complaints from Clients, where regular consultation between the Client and an employee of the Manager has not resulted in a solution. The Complaints Committee has a multidisciplinary composition, including at least one member of the BoD;
<b>KiFiD</b>	Klachteninstituut Financiële Dienstverlening, is the Dutch Institute for Financial Disputes. It can be approached by parties that received a dissatisfying financial product or service and after a hearing with the party providing that financial product or service has not resulted in a mutual resolution for both parties ( <a href="http://www.kifid.nl">www.kifid.nl</a> ).
<b>Manager</b>	FundShare Fund Management B.V., a private limited liability company incorporated under the laws of The Netherlands with its corporate seat (statutaire zetel) in Amsterdam, or its legal successor, as well as any entity that is charged with the management of the Fund thereafter. The Manager is the management company of the Fund and is entrusted with the management of the Funds;

# Complaints Handling Procedure

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## Introduction

FundShare Fund Management B.V. (“FFM”) strives to offer its Clients transparency and high-quality services. Every day, all employees of FFM are committed to exceed Clients expectations. If Clients should not be satisfied with any aspect of the service, FFM invites its Clients to make this known immediately, so that both parties can evaluate the issue in discussion and can work towards a suitable solution together. Every expression of dissatisfaction also enables FFM to improve its services.

### **Article 1. Submission of a Complaint**

1. A Complaint can be submitted by telephone or e-mail.
2. A Complaint by e-mail must contain the following information:
  - a) the name of the Client;
  - b) Client number and/or account number or other unique reference;
  - c) a description of the Complaint; and
  - d) any relevant documents substantiating the Complaint.
3. Complaints can be submitted up to a maximum of twelve months from the moment when the fact about which the client wishes to complain took place, or up to twelve months from the moment that the client could reasonably have become aware of that fact.

### **Article 2. Handling of a non-written Complaint**

1. Non-written or verbal Complaints can be handled by an employee of the Manager by hearing this Complaint, if the complainant indicates that he is satisfied with an oral hearing. Even if the complainant does not request that the Complaint be handled by email, the Manager may decide to deal with a non-written Complaint by email.
2. The Complaints Committee is informed about the verbally handled Complaint.

### **Article 3. Handling of a Complaint by E-mail**

1. Complaints submitted by e-mail will be handled by the Complaints Committee.
2. When dealing with the Complaint, the Complaints Committee will fully (re) assess the circumstances that gave rise to the Complaint. To this end, the Complaints Committee may request further information from the complainant and any employee (s) involved.
3. The Complaints Committee aims to provide a (first) substantive response to the Complaint within five working days of receipt of the Complaint. In the unlikely event that the Complaint cannot be dealt with within this period, a confirmation of receipt will be sent with an undertaking when a reply is expected at the latest.
4. The Complaints Committee will inform the complainant of a Complaint that is handled by e-mail, with reasons, of its judgment.

### **Article 4. Administrative recording of Complaints**

1. If a Complaint is submitted, at least the following information is recorded electronically in the records (under consideration of GDPR requirements):
  - a) the name and address of the complainant;

# Complaints Handling Procedure

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- b) the (description of the) Complaint and the date of receipt thereof;
  - c) a description of the way in which the Complaint has been handled;
  - d) the further correspondence in response to the Complaint; and
  - e) the verdict of the Manager.
2. The Manager will keep the data referred to in paragraph 1 in its administration for at least one year after the Complaint has been handled.

## Article 5. Contact Information

FundShare Fund Management B.V.

[contact@fundshare.nl](mailto:contact@fundshare.nl)

020 2477 277

Duivendrechtsekade 82

1096AJ Amsterdam

InDelta (a trade name of FundShare Fund Management B.V.)

[contact@indelta.nl](mailto:contact@indelta.nl)

020 2477 222

Duivendrechtsekade 82

1096AJ Amsterdam

## Article 6. KiFiD (Klachteninstituut Financiële Dienstverlening)

If the opinion of the Complaints Committee and the solution proposed on the Complaint is not satisfactory for the complainant, the dispute can be submitted to KiFiD.

### **KiFid**

PO Box 93257

2509 AG The Hague

Telephone 070-3338999

E-mail [consumers@kifid.nl](mailto:consumers@kifid.nl)

More information about Kifid can be found via the website [www.kifid.nl](http://www.kifid.nl).

## Article 7. Date of Effectiveness

This version of the Complaints Procedure is applicable from the date of approval.