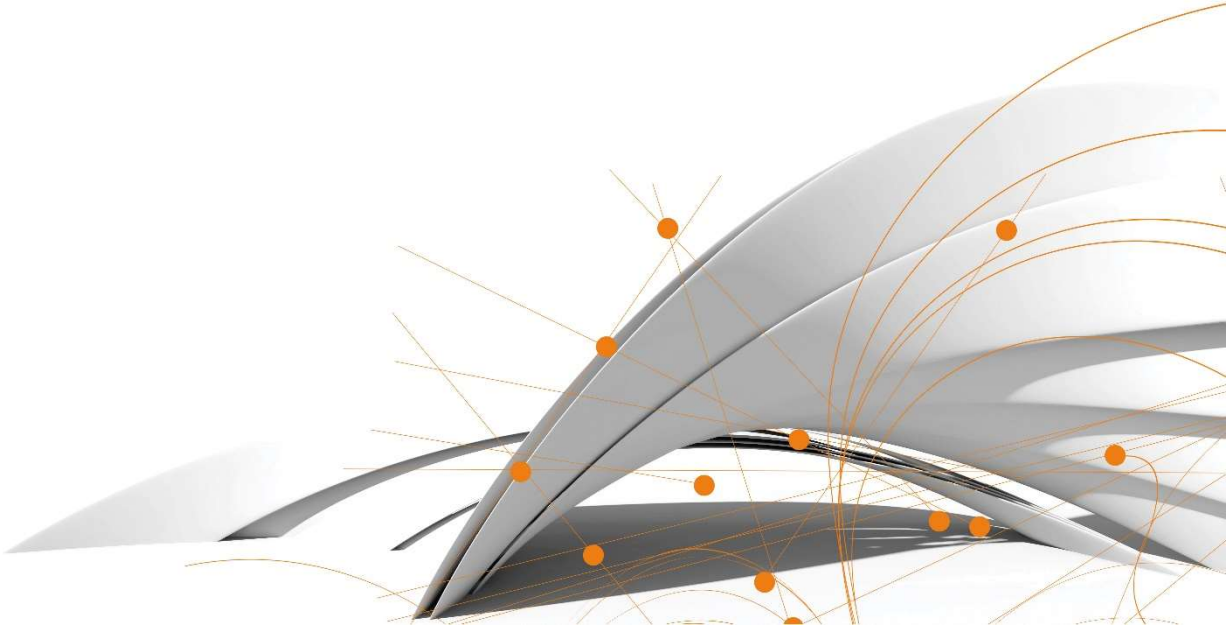


Complaints Policy Procedure



Complaints policy procedure

TOBAM has a regulatory obligation to treat complainants fairly. TOBAM must ensure that complaints are acknowledged and dealt with in a timely manner and that the complainant is kept informed of his/her complaint's progress.

European regulatory texts:

- AMF General Regulations: articles 318-10, 318-10-1, 321-40 and 321-41
- MiFID II: Article 75

I. Complaint sending

A complaint means a request by a client (including their representative) for corrective action or any written statement alleging a grievance related to the management of the client's account that involves TOBAM. Complaints may relate to securities orders, investment recommendations, or failure to respond to client communications. Mere service inquiries, such as those expressing general disappointment with TOBAM or the client's investments, shall not be considered a complaint.

Complaints should be made in writing and sent to the address provided below.

The complainant may send his/her claim in the official language or one of the official languages of the European Union Member State in which the collective investment scheme is passported, and will receive a response in the same language.

Complaints must be sent:

- By post to the following address: TOBAM, Compliance officer, 49-53 avenue des Champs Elysées, 75008 Paris, France, or
- By email to: compliance@tobam.fr

II. Complaint dealing

1. Receipt of a Complaint

When a complaint is received, either from a client or a regulatory body, TOBAM's President, COO and Compliance must be informed immediately.

2. Notifying the complainant of the Complaint's receipt

TOBAM, within ten business days of receipt, will reply in writing to the complainant explaining that the complaint is being investigated (providing the name, position, department and contact details of the investigating person). It will indicate when a response should be expected if a final answer has not already been given.

3. Investigating the Complaint

Compliance is responsible of the complaint's management and can use all means necessary to the investigation.

4. Resolving the Complaint

TOBAM will then attempt to resolve the complaint in a timely manner and keep the complainant informed of its progress. All efforts should be made to resolve the complaint within four weeks of receipt. In any case, TOBAM will get back to the complainant with a final response within eight weeks of receipt or provide an alternative timeframe for a final response and explaining the delay.

The President, the COO must be consulted prior to resolution.

5. The AMF mediator

In case the complainant considers his/her complaint has not been fully or has been only partially resolved 2 months after the initial request was sent, he/she can ask the AMF mediator to intervene or help him/her to find out the appropriate mediator in case of a cross-border dispute. Contacts are below:

AMF mediator

17, place de la Bourse - 75082 Paris Cedex 02

Front desk (Reception): 01 53 45 60 00

Consumer helpline (Épargne Info Service): 01 53 45 62 00

Online forms:

- French version:

http://www.amf-france.org/Formulaires-et-declarations/Contact.html?lst_select_form_theme_id=mediation

- English version:

http://www.amf-france.org/en_US/Formulaires-et-declarations/Contact?lst_select_form_theme_id=mediation

III. Recordkeeping

Compliance shall keep a record of all complaints, including all correspondence and other documentation relating to the complaint under G:\Compliance\Admin\ Compliance incidents\Complaints. The documents shall be retained for the period stated in the Books and Records Register located under: G:\Compliance\Procedures\Procedures - Compliance\Books and records procedure.