

### **COMPLAINTS PROCEDURE**

#### PURPOSE OF THE COMPLAINTS PROCEDURE

The purpose of this procedure is to regulate the complaint handling process of MIRABAUD ADVISORY (Uruguay) S.A. (hereinafter "MIRABAUD URUGUAY" or "Investment Advisor") regarding any complaints that may arise in customer relationships, in accordance with the regulations of the Central Bank of Uruguay (hereinafter BCU) and the institution's internal regulations.

#### **COMPLAINTS MANAGER**

Fabio Damian Kreplak is the designated manager for the possible existence of any complaints for services provided directly by MIRABAUD URUGUAY or complaints against other financial entities of the group involved in the investment process. He will be responsible for the control and verification of compliance with the precepts established in this procedure.

MIRABAUD URUGUAY will adopt the necessary measures to ensure that the complaints manager has adequate knowledge of the regulations of the securities market and, in particular, the regulations regarding transparency and protection of users of financial services.

#### MANAGER'S RESPONSIBILITIES

The main role of the complaints manager will be:

- To resolve any complaints that customers may raise in relation to operations, contracts or investment services and, in general, all
  relationships between the Investment Advisors and their customers, which, in their judgement, may have violated their legal or
  contractually recognised rights.
- To resolve issues raised by the various staff members regarding queries and complaints from customers.
- To ensure compliance with user protection and transparency legislation.
- To collaborate in developing internal regulations.
- To respond to requests for information from the supervisor.

#### WAYS TO MAKE COMPLAINTS

A complaints form is available to customers (from our offices or can be requested via email). This form must be completed and submitted by the customer to the complaints manager.

The ways to make a complaint are the following:

- Hard copy to the address: Luis Alberto de Herrera 1248, torre III, oficina 1676
- Via email to: <a href="mailto:fabio.kreplak@mirabaud.com">fabio.kreplak@mirabaud.com</a>

#### RECEIPT OF COMPLAINTS

The Investment Advisor will receive complaints regarding services rendered, as well as customer complaints against group entities participating in the advisory process, account opening or custody of securities. In all cases the Investment Advisor and in particular the complaints manager undertake to follow them up.

If the complaint cannot be resolved immediately, the entity will send an acknowledgment of receipt, which will include a reference number, the date of the complaint and an estimated response time.

#### TIME LIMIT FOR ISSUING A RESOLUTION

This period will be up to a maximum of 15 calendar days depending on the difficulty of the case, which may be renewed once for a period of less than 15 calendar days. If the compliant involves an external entity, the time limit may be extended again by sending a note to the customer in which MIRABAUD URUGUAY undertakes to do everything possible to resolve the problem as quickly as possible.



That said, the company endeavours to work effectively and estimates a period of five business days for cases where the response depends on the advisors, and a period of 10 days when it requires information from another institution, provided that that entity provides the information in a timely manner.

#### NOTIFICATION OF THE RESOLUTION

MIRABAUD URUGUAY will inform the customer of the result of their complaint with a notice or an email, providing a full and reasoned response. In the case of an unfounded complaint, a notice will be sent explaining why the request is not being addressed.

The response sent to the customer will explain that they have the right to transfer the complaint to the BCU Financial Services Superintendency if they are not satisfied with the response provided.

#### ANNUAL REGISTRATION OF COMPLAINTS

A record will be kept to control all resolved and inconclusive complaints and continue with the process of ongoing improvement.

There will be an annual report with the following minimum content:

- A statistical summary of claims and complaints containing: number, customer making the complaint, date of the complaint, date of resolution, issues raised and amounts concerned.
- A summary of decisions made, indicating to the claimant whether it was favourable or unfavourable.
- General criteria contained in the decisions.



## **COMPLAINTS FORM**

1) CUSTOMER IDENTIFICATION:	
CUSTOMER CODE:	
Name and Surnames:	
Date of complaint:	Time:
Email:	Mobile phone:
2) IDENTIFICATION OF THE CUSTODIAL ENTITY (IF APPL  Name of bank:	ICABLE):
3) DESCRIPTION OF COMPLAINT:	
CUSTOMER'S SIGNATURE	
Name:	Signature:
DEAR CUSTOMER, YOU WILL RECEIVE A WRITTEN RESP PLEASE CONTACT THE COMPLAINTS MANAGER.	PONSE WITHIN 15 CALENDAR DAYS. AFTER THIS TIME
5) NOTIFICATION OF COMPLAINT	
Date and Time of receipt:	Time to response:
Compliant reference number:	



# **COMPLAINTS FORM**

Resolution of complaint No	
1) CUSTOMER IDENTIFICATION:	
CUSTOMER CODE:	
Name and Surnames:	
Date of complaint:	Time:
Email:	Mobile phone:
a) DECRONCE TO THE CLAIM	
2) RESPONSE TO THE CLAIM	
3) NOTIFICATION OF RESPONSE	
Notification date:	
Reported to:	
Notified by:	Signature:
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