



# Complaints Handling Policy and Procedure

BlueBay Funds Management Company S.A.

In accordance with Article 15 (1) of CSSF Regulation 16-07 and Circular CSSF 18/698, BlueBay Funds Management Company S.A. ("BlueBay Lux") has put in place a policy and procedures for the handling and review of Clients complaints and to ensure that such complaints are handled properly and are resolved in a prompt and timely manner, taking into account the Investor's interests.

A complaint is a claim to recognize a right or redress an issue in terms of the services provided in relation to BlueBay Lux funds under Management. However, a request for information, clarification or service is not a complaint. Complaints may be submitted in writing (either by mail or email) and can be made by Clients directly; or may be made through the Investor's financial intermediary.

Complaints may be submitted in French, English, German or in the official language of the country where the Company's branch, to which activity the complaint relates, is located.

The communication should clearly indicate that it is a complaint and should be directed to the attention of the **Complaints Handling Officer** by email:

<b>Email</b>	BFMC_Complaints@bluebay.com
<b>In writing</b>	BlueBay Funds Management Company S.A. Complaints Handling Officer 4, Boulevard Royal L-2449 Luxembourg

Alternatively:

## **For Clients in Germany:**

Clients from Germany can forward their complaints to

<b>Email</b>	BFMC_Complaints@bluebay.com
<b>In writing</b>	BlueBay Funds Management Company S.A., Zweigniederlassung Deutschland Complaints Handling Officer Perstallozzistraße 31, 80469 Munich Germany

The communication should include a detailed description of the facts and the cause of the complaint including relevant supporting documentation.

From a German Law perspective, the submission of a complaint must not be subject to the requirement regarding its form and content which could constitute an obstacle for the client to file a complaint. Although it is ultimately a matter of Luxembourg laws and CSSF supervision, BaFin also recommends clients to explain the underlying grievance "as precisely as possible" and in writing: "*BaFin - Making a complaint to a company*".

**For Clients in Spain:**

<b>Email</b>	BFMC_Complaints@bluebay.com
<b>In writing</b>	BlueBay Funds Management Company S.A., Sucursal en España Complaints Handling Officer Calle Maria de Molina 4, piso 4, Madrid 28006 Spain

In accordance with the Spanish Ministerial Order ECO 734/2004, Anne-Cecile Pirard will be acting as the Client Defense Officer of the branch and will be responsible for the local client claims and complaints with respect to the activity of BlueBay Funds Management Company S.A, Sucursal en España.

In addition, on the official site of the CNMV<sup>1</sup> the Company will make available a document in Spanish, outlining the terms and procedures regarding handling clients claims for the branch.

**For Clients in Italy:**

<b>Email</b>	BFMC_Complaints@bluebay.com
<b>In writing</b>	BlueBay Funds Management Company S.A., Italian Branch Complaints Handling Officer Via San Clemente 1, Milano 20122 Italy

**For Clients in the Netherlands:**

<b>Email</b>	BFMC_Complaints@bluebay.com
<b>In writing</b>	BlueBay Funds Management Company S.A., the Netherlands Branch Complaints Handling Officer Barbara Strozzi laan 364, EuroCenter II Building 1 <sup>st</sup> Floor, 1083HN Amsterdam The Netherlands

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<sup>1</sup> Comisión Nacional del Mercado de Valores

## Out-of-court complaints resolution procedure

Following the conclusion of BlueBay Lux investigation, BlueBay Lux will provide, within a period of one (1) month from the date the client complaint is received, a written response to the complaint, notifying the Investor of the outcome of the investigation and the actions proposed to resolve the complaint.

In accordance with the provisions of [regulation no. 16-07](#) issued by the Luxembourg financial regulator the Commission de Surveillance du Secteur Financier (the "CSSF"), if after one (1) month following the submission of the complaint to BlueBay Lux, the client has not yet received a written acknowledgement of receipt or has received an answer which he/she/it does not view as satisfactory, then the client may contact the CSSF in writing (i.e. by post, by fax, by e-mail or online on its Website) in order to request the latter to assist with settling amicably the conflict opposing him/her/it to BlueBay Lux. In this case the request with the CSSF must be filed within one year after filing complaint with BlueBay Lux.

Email	<a href="mailto:reclamation@cssf.lu">reclamation@cssf.lu</a>
In writing	<b>Commission de Surveillance du Secteur Financier Département Juridique CC 283, route d'Arlon L-2991 Luxembourg</b>  <b>Or filling in the online complaint via the following link: <a href="https://reclamations.apps.cssf.lu/index.html?language=en">CSSF - Réclamation</a></b> <a href="https://reclamations.apps.cssf.lu/index.html?language=en">https://reclamations.apps.cssf.lu/index.html?language=en</a>
Tel:	(+352) 26 251 - 2904
Fax:	(+352) 26 251 - 2601

### For Clients in Germany:

Under the German Investment Code (Kapitalanlagegesetzbuch, "KAGB"), the complaints handling of the German Branch is generally subject to Luxembourg laws and supervision by the CSSF as part of the general organizational requirements under Section 51 para. 4 sentence 1, Section 54 para. 4 sentence 1 of the KAGB. Though the clients may at any time (i.e. also instead or in parallel to a complaint submitted to BlueBay), file complaints relating to services provided by the German Branch to the German Financial Services Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, "BaFin"). BaFin would handle such complaints in cooperation with the CSSF (section 342 para 3 KAGB). The ombudsman proceeding with the German Ombudsman for investment funds is not applicable to the German Branch, as BlueBay is not a member of the ombuds office.

Email	<a href="mailto:poststelle@bafin.de">poststelle@bafin.de</a>
In writing	<b>Bundesanstalt für Finanzdienstleistungsaufsicht Abteilung IF Graurheindorfer Straße 108 53117 Bonn Germany</b>  <b>You can submit your complaint to BaFin using an <a href="https://web.basp.bafin.de/lip/form/display.do?%24context=5F2F35E1DC3DA4DF6658">online form</a> (only available in German).</b> <a href="https://web.basp.bafin.de/lip/form/display.do?%24context=5F2F35E1DC3DA4DF6658">https://web.basp.bafin.de/lip/form/display.do?%24context=5F2F35E1DC3DA4DF6658</a>
Calling from Germany :	+49 (0) 228 4108-0
Calling from abroad	+49 228 299 70 299
Fax	+ 49 (0)228 4108-1550

### For Clients in Spain:

In the event a complaint is made to the Company's German branch, and it does not result in a satisfactory resolution of the complaint, the Client can submit the complaint to local complaints authority – Comision Nacional Del Mercado De Valores – CNMV. The customer care departments or services and, where appropriate, the customer ombudsman, have two months to issue a reasoned statement, starting from the date of receipt of the complaint.

Should you not receive a response within one month, or if you are not satisfied with the reply provided, you will have a period of one year to file a complaint with the Complaints Service. The Complaints Service may admit the claim as long

as no more than five years have passed since the events subject to the complaint occurred and up to the date of the filing the claim with the entity's customer service department or the client's ombudsman.

Submit your complaint by **electronic means**.

<b>In writing</b>	<b>You can submit a <u>form</u> addressed to the Complaints Service:</b> <a href="https://cnmv.es/DocPortallnv/OtrosPDF/EN-FormularioreclamacionequejasCNMV.pdf">https://cnmv.es/DocPortallnv/OtrosPDF/EN-FormularioreclamacionequejasCNMV.pdf</a>  C/ Edison, 4, 28006 Madrid C/ Bolivia 56, (4 <sup>a</sup> Planta) 08018 Barcelona Spain
<b>Tel</b>	<b>900 535 015</b>

### **For Clients in Italy:**

Taking into consideration the target Clients to which the Branch addresses its activities in Italy, please note that there are no alternative dispute resolution systems available to professional clients as defined under MIFID II and Article 34-ter, paragraph 1, letter b) of CONSOB Regulation No. 11971/1999.

Therefore, in case the response to the Client's complaints does not satisfy the Client, it could only appeal competent Judicial Authorities.

Such Clients are allowed to submit a complaint to the Bank of Italy and/or CONSOB to report conducts that they consider to be irregular or unfair in the provision of financial services ("*Esposto alla Banca d'Italia ed esposto alla CONSOB*"), but the relevant procedure does not qualify as alternative dispute resolution system (<https://www.bancaditalia.it/servizi-cittadino/servizi/esposti/index.html?com.dotmarketing.htmlpage.language=1> and <https://www.consob.it/web/investor-education/l-invio-di-esposti>).

The Bank of Italy and/or CONSOB cannot provide immediate and direct protection to the rights of the relevant complainant. The Regulators will assess the irregular or incorrect behaviour of the relevant intermediary and impose applicable sanctions in the more general interest of protecting the market.

### ***To the Bank of Italy***

Complaints can be filed by means of a guided process on the Bank's platform Online Services for the Public.

<b>Email</b>	<b>bancaditalia@pec.bancaditalia.it</b>
<b>In writing</b>	<b>via Nazionale 91, 00184 Rome Italy</b>  <b>You can submit a complaint to the Bank of Italy via the following link:</b> <a href="https://servizionline.bancaditalia.it/esposto">https://servizionline.bancaditalia.it/esposto</a>
<b>Tel:</b>	<b>+39 06 47921</b>

### ***To CONSOB***

<b>Email</b>	<b>consob@pec.consob.it</b>
<b>In writing</b>	<b>CONSOB - Divisione Tutela del Consumatore, Ufficio Consumer Protection, Via G.B. Martini, 3 - 00198 Roma; and CONSOB - Divisione Tutela del Consumatore, Ufficio Consumer Protection, Via Broletto, 7 - 20121 Milano</b>  <b>You can submit a complaint to the CONSOB via the following link:</b> <a href="https://adempimenti.consob.it/Esposti-web/home.jsessionid=4pgoNedp_0THjKds_4-GZYWW9LVW3N13HASIS6KI.cnb407-rhv?jf.menuId=">https://adempimenti.consob.it/Esposti-web/home.jsessionid=4pgoNedp_0THjKds_4-GZYWW9LVW3N13HASIS6KI.cnb407-rhv?jf.menuId=</a>

<b>Facsimile</b>	<b>06 8416703 – 06 8417707</b>

In the event a complaint does not satisfy the client, the client may refer the complaint to the Italian Financial disputes Arbitrator (Arbitro delle Controversie Finanziarie, ACF) at the following address:

<b>Email</b>	<a href="mailto:info.acf@consob.it">info.acf@consob.it</a> <a href="mailto:acf@pec.consob.it">acf@pec.consob.it</a>
<b>In writing</b>	<b>Via Giovanni Battista Martini, 3</b> <b>00198 Rome</b> <b>Italy</b>  <b>You can submit a complaint to the Bank of Italy via the following link:</b> <b><a href="https://www.acf.consob.it/">https://www.acf.consob.it/</a></b>
<b>Tel:</b>	<b>+39 06 8477850</b>

The Financial Dispute Arbitrator is an alternative disputes resolution system, active and regulated by CONSOB, whose purpose is to provide an alternative, agile and efficient mean of dispute resolution to the consumers who are not satisfied with the complaint management carried by their intermediaries.

Appeals to the ACF are completely free of charge for consumers and decisions would be taken in six months from filing of the request. In its decision the ACF will determine any compensation to be paid by relevant intermediaries. The recourse to the ACF is inalienable. The Company shall guarantee considering the guidelines inferable from the decisions taken by the Arbitrator and that the details of the complaints submitted to the ACF will be provided in the Company's final response.

### **For Clients in Netherlands:**

In the event a complaint is made to the Company's Netherlands branch, and it does not result in a satisfactory resolution of the complaint, the Client can submit the complaint to local complaints authority - Klachteninstituut Financiële Dienstverlening (Kifid). The Client can also bring the dispute before the Dutch civil court directly.

<b>Email</b>	<b><a href="mailto:consumenten@kifid.nl">consumenten@kifid.nl</a></b>
<b>In writing</b>	<b>Klachteninstituut Financiële Dienstverlening (Kifid)</b> <b>Consumer desk</b> <b>Postbus 93257 2509 AG Den Haag</b> <b>The Netherlands</b>  <b>Or filling in the online complaint via the following link:</b> <a href="https://www.kifid.nl/wp-content/uploads/2024/04/Kifid-Klachtformulier-ENG-consument-1-april-2024.pdf">https://www.kifid.nl/wp-content/uploads/2024/04/Kifid-Klachtformulier-ENG-consument-1-april-2024.pdf</a>
<b>Tel:</b>	<b>+31 70 333 8 999</b>

On receipt of a complaint BlueBay Lux will commence investigation and will provide an answer to the client without undue delay and will acknowledge of receipt of the complaint in writing within ten (10) business days.

BlueBay Lux will handle all complaints in accordance with the following four principles:

- a transparent review process for the Investor;
- no additional fees will be incurred by the Investor as a result of the complaint;
- an objective approach; and
- timeliness of response.

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