

FINANCE IN MOTION ASSET MANAGEMENT S.À R.L.

Complaints Handling Policy

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1. Scope and Applicability

Finance in Motion Asset Management S.a.r.l (“FIM” or “the Company”) is a leading impact asset manager with an exclusive focus on sustainable development finance. Through developing and advising alternative investment Funds, FIM aims to generate positive social and environmental impact alongside a financial return.

FIM is an AIFM according to the Luxembourg law of 12 July 2013 on alternative investment managers and manages portfolios as regulated by Art. 5 (4a) and provides investment advice as regulated in Art. 5 (4b) of the AIFM Law.

The purpose of this Policy is to establish a formal and structured framework for addressing and resolving Complaints from Customers and stakeholders, ensuring their rights are protected, trust and transparency are maintained, and regulatory compliance obligations are met.

The Policy is applicable to the Funds under the FIM management, the FIM Group entities, and all customers and stakeholders.

2. Complaint definition and Confidentiality

For the avoidance of doubt, a Complaint is defined as a written communication submitted to FIM, aimed at asserting a right or seeking rectification for an identified issue, perceived wrong, or harm. Requests for information or clarification, as well as suggestions or recommendations intended to improve products, services, or processes, are not classified as complaints.

Complaints will be handled with the highest level of confidentiality, ensuring that all information provided is protected and treated with strict discretion throughout the resolution process.

3. Complaints Handling Process

3.1 Complaint Filing

All Complaints must be notified to the Company in written form, through one of the following channels:

- **Postal mail:**
Finance in Motion Asset Management S.à.r.l.
Attention: Complaints Handling Officer
68 Boulevard de la Pétrusse, L- 2320 – Luxembourg
- **E-mail address:** AIFMComplaints@finance-in-motion.com

Complaints should be reported in English, French, German or Luxembourgish.

The following information should be provided to ensure prompt handling of the Complaint:

- Identity and contact details of the Complainant (if not anonymous, see below);
- Reason for the Complaint, including:
 - Allegations and the resulting alleged damage or loss in relation thereof;
 - Information on connection to the Fund under management of the Company its investee, or Group;
 - Details on remedy or resolution being sought;

- Where necessary, copies of any documentation or evidence supporting the Complaint.

Complaints submitted via the specified email address will be automatically directed to the Complaints Handling Officer of FIM.

Anonymous complaints

Anonymous complaints can be received; however, such complaints can be challenging to escalate, investigate, and resolve. Anonymous Complainants should note that:

- Such complaints will be managed according to this procedure to the extent possible, however FiM /Group may be limited in its ability to investigate, communicate, follow-up, or meet all requirements of the procedure due to the complaint's anonymous nature
- Efforts to investigate or follow-up will seek to maintain Complainant anonymity, unless such anonymity is waived.

3.2 Complaint Receipt Confirmation

The Complaints Handling Officer shall send a written acknowledgment of receipt to the Complainant within a period that shall not exceed (10) ten business days after receipt of the Complaint, unless the answer itself is provided to the Complainant within this period.

Such acknowledgment of receipt should contain the name and contact details of the person in charge of communicating with the Complainant and an indication on when the answer to the Complaint can be expected. This time indication shall be within one (1) month after the receipt of the Complaint.

3.3 Complaint Resolution

The FIM Complaints Handling Officer is responsible for providing a final written response to the Complainant within the established timeframe. If the review exceeds one month, an interim update will be shared, explaining the delay and indicating the expected completion date. The final response will outline the Company's position and inform the Complainant of alternative dispute resolution options or the possibility of civil action.

Any final response to the Complainant will be delivered in written form or through another durable medium.

4. Documentation and Escalation

4.1 Complaints Register

The Complaints Handling Officer ensures that all Complaints, along with the measures taken to address them, are duly recorded in a confidential Complaints Register with restricted access. All complaints records shall be retained for a minimum period of five (5) years.

4.2 Escalation for unresolved Complaints

If the Complainant does not receive a satisfactory response from the FiM internal bodies, they are entitled to escalate the Complaint to the CSSF or other external authority for further investigation, as appropriate. The Complaints Handling Officer shall inform the Complainant of their regulatory right to do so and

indicate the different means to contact the CSSF, if the internal resolution process does not resolve the Complaint satisfactorily.

Should the CSSF request the FiM's position on the facts or opinions presented, or request additional information or documentation, the FiM will provide the requested materials within the designated timeframe. If the CSSF deems the Complaint fully or partially valid and suggests a settlement, FiM /the Group will make every effort to reach a resolution with the Complainant to conclude the matter.

5. Anti-retaliation commitment

FiM is committed to protect Complainants from acts of harassment, retaliation or adverse consequences arising from filing a Complaint in good faith. FiM will take seriously any credible allegations of reprisals. In the case of reprisals by a third-party service provider, the AIFM may consider sanctions, including termination of the relationship.