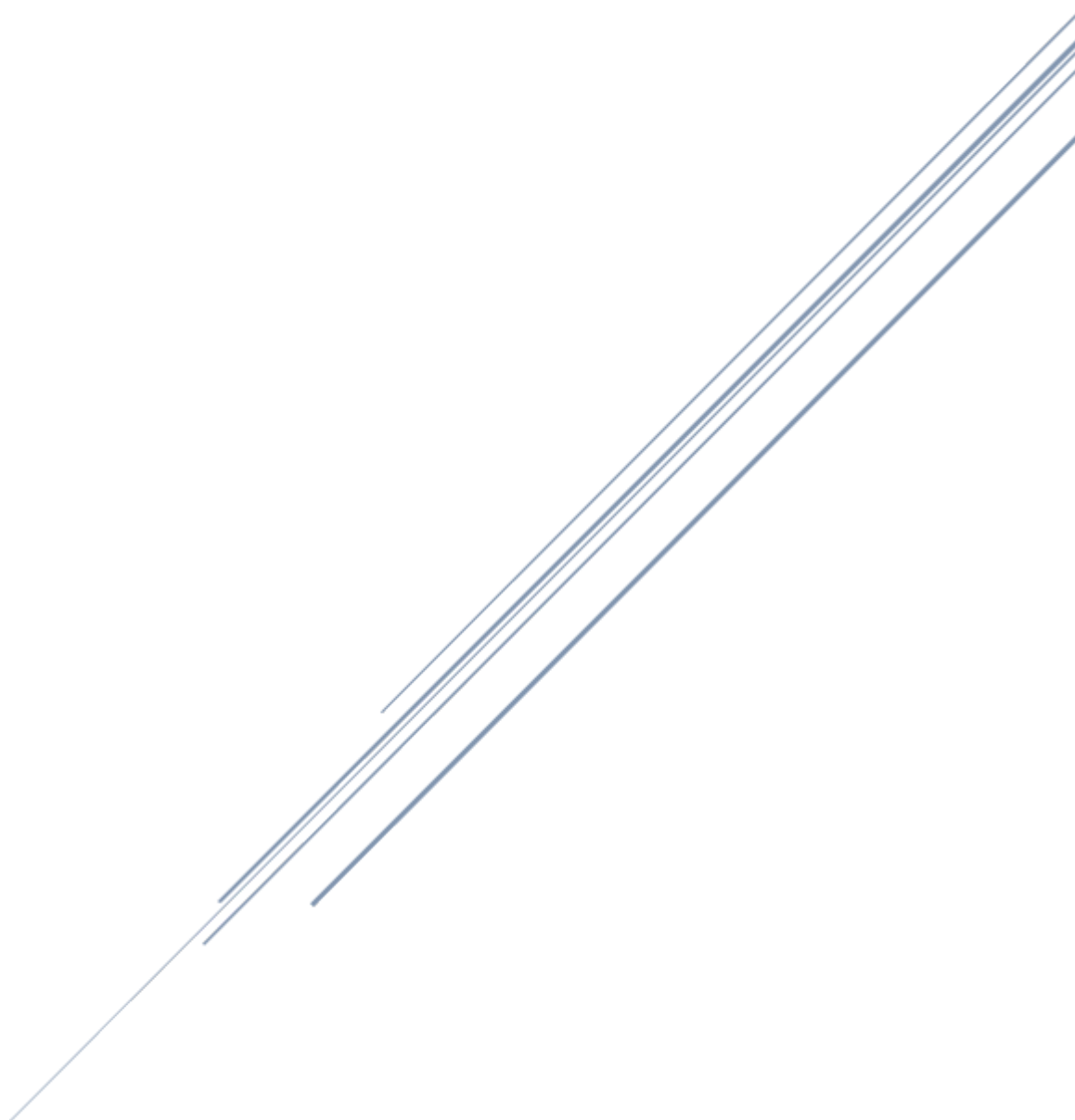


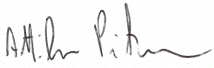
COMPLAINTS HANDLING POLICY






Approved by	Board of Directors
Prepared by	Enrico Amarante Compliance Officer
Date of Introduction	November 2018
Date of Last Review	7 August 2023

Signed by:

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Attilio Pietranera

On behalf of the Board of Directors of
AMA UCITS SICAV PLC

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Enrico Amarante

Compliance Officer
AMA UCITS SICAV PLC



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1. Introduction

AMA UCITS SICAV PLC (hereinafter the “Company”) is committed to providing high quality services to all its investors. However, it is recognised by the Company that there may be occasions where the investors may have concerns regarding the Company’s services.

The Malta Financial Services Authority (“MFSA”) requires the Company to have a clear and defined procedure/ process when dealing with complaints from investors whether the complaint is in the form of a letter, email or telephone call. This is to ensure that complaints are handled promptly, fairly effectively and impartially, minimizing the number of unresolved complaints.

As such, the Company has established and implemented appropriate procedures and arrangements to ensure that it deals promptly and reasonably with complaints by investors. The purpose of this document is to explain how a complaint can be lodged, and the complaints management procedure followed by the Company.

2. What is a Complaint

The Company defines a complaint as any expression of dissatisfaction, whether oral or written, justified or not, from, or on behalf of an Eligible Complainant about the provision of, or failure to provide, a financial service from the Company (in accordance with the type of financial licence granting the provision of such financial services), which:

- alleges that the eligible complainant has suffered or may suffer financial loss, material distress or material inconvenience; and
- relates to an activity of the Company

(the “**Complaint**”).

3. Eligible Complainants

An eligible complainant is a current investor of the Company, or a subject who sought to become an investor in the Company or a subject to whom the Company has offered to become an investor in the Company. It includes the lawful successor in title to the service which is the subject of the relevant Complaint (the “**Eligible Complainant**”).

4. The Complaint Handling Procedure

4.1. *Submission of complaint*

In case of dissatisfaction with the Company’s services, the Eligible Complainant can lodge a Complaint with the Company (via the channels and to the contact details described below), briefly setting out all the facts regarding the issue and providing useful information such as date, venue, the nature of the Complaint and copies of any documentation supporting such Complaint.

Eligible Complainants may file their Complaints in the official language of their respective Member States in which the Company has passporting rights and/or in English.

4.2. *Initial response and acknowledgement of receipt of complaint*

An initial response in writing shall be provided to the Eligible Complainant within seven days of receipt of the Complaint. Such response shall include the following:

1. acknowledgement of the receipt of the Complaint;
2. indication of where the information concerning the complaints handling process can be found;
3. communication of the Complaint reference code (as allocated in the complaints register), which shall be referenced in all communications sent in relation to such Complaint;
4. confirmation that the Company shall investigate the Complaint;



5. confirmation that the Company shall, on completion of the investigation and without unnecessary delay, write to the Eligible Complainant concerning the outcome of the investigation and describing its proposed course of action; and
6. communication of the fact that if the investigation is not completed within two months of receipt of the Complaint, the Company shall inform the Eligible Complainant of such fact within seven business days from the end of the above mentioned period.

4.3. *Analysis of Complaint*

The Company shall seek to gather and investigate all relevant evidence and information regarding the Complaint.

4.4. *Delays in the handling of a Complaint*

Where the investigation of a Complaint is not completed within two months from receipt thereof, the Company shall, in the communication informing the Eligible Complainant of such fact (to be sent within seven business days from the end of that period) referred to above:

1. inform the Eligible Complainant about the causes of the delay;
2. provide an indication as to when the investigation is likely to be completed.

4.5. *Final Response*

The Company shall send a final response to the Eligible Complainant within three months of receipt of the Eligible Complainant's Complaint.

Such final response shall include the outcome of the investigation and describing its proposed course of action, if any.

A copy of this communication shall be retained in the complaints register with the initial Complaint, the complaints handling form and any investigating material.

4.6. *Complaints received by Telephone Call or orally*

During the telephone call or oral exposition, the Eligible Complainant must be asked if it wishes to lodge a Complaint. If the Eligible Complainant advises that it wishes to lodge a Complaint, then the Eligible Complainant must be requested to provide as much detail as possible relating to the Complaint so that it can be properly referred to the Compliance Officer to oversee the handling process.

Where a Complaint is made orally, the Company shall make a summary of the Complaint and request the Eligible Complainant to confirm in writing the said summary.

4.7. *Complaints received by Letter*

All complaints received by letter must be provided to the Compliance Officer who will oversee the handling process and respond to the Eligible Complainant within the prescribed time frame.

4.8. *Complaints received by Email*

If a Complaint has been received either to one of the group email addresses or sent to a personal email address, different from the one sent below, the email must be either forwarded electronically to the email address as specified below and provided to the Compliance Officer.

4.9. *Complaints Handling Form*

The Compliance Officer, upon receipt of any Complaint, shall complete the first part of the complaints form (as in Appendix II), including the reference code. and remember to update it after each stage of the complaints procedure. The resolution of any Complaint shall be undertaken by the Compliance Officer or any other nominated individuals to ensure that the Complaint is handled competently and fairly; and to ensure that the remedial measures are taken.



5. Internal Follow-Up of Complaints Handling

The Company shall analyze complaints-handling data on an on-going basis in order to ensure that it identifies and addresses any recurring or systemic problems and any potential legal and operational risks by, for instance, carrying out the following:

- a. analysing the causes of individual Complaints so as to identify root causes common to types of Complaint;
- b. considering whether such root causes may also affect other processes or products, including those not directly complained of; and
- c. correcting, where reasonable to do so, such root causes.

6. Office of the Arbiter for Financial Services

In case of dissatisfaction with the Company's reply, the Eligible Complainant may refer the Complaint to the Arbiter for Financial Services. The Eligible Complainant may alternatively send, but not necessarily, in the first instance, the Complaint to the Office of the Arbiter for Financial Services.

The Office of the Arbiter for Financial Services (OAFS) is an autonomous and independent body. It has the power to mediate, investigate and adjudicate complaints filed by customers against financial services providers. Consumer complaints against financial institutions licensed by the Authority may be lodged by residents and non-residents at the Office of the Arbiter for Financial Services in terms of Act XVI of 2016 – The Arbiter of the Financial Services Act, 2016.

The Eligible Complainant may contact the Office of the Arbiter for Financial Services on 80072366 or 21249245. Further details about the set-up, including information about the Arbiter's complaint procedure are accessible from the following portal Office of the Financial Services Arbiter website.

The Arbiter will try mediation as the first and best option for resolving the matter. If the mediation has not been successful or has been refused, the Arbiter will start investigating the Eligible Complainant's Complaint. All the circumstances surrounding the Complaint will then be examined and the case will be judged on its individual merits.

Decisions reached by the Arbiter may be subject to appeal by either party to the Complaint. If the Eligible Complainant does not want to accept a decision by the Arbiter, it can take his case to court. When no appeal is made by either party, the decision taken by the Arbiter becomes final and binding on all parties.

7. Complaints Register

Any Complaint received by the Company shall be logged in the complaints register which is maintained centrally by the Compliance Officer. Such a register shall also record all the actions taken in regard to the Complaint, the date on which it was received and the date on which it was resolved. Moreover, all documentation received from the Eligible Complainant along with copies of any letters written and investigation documentation shall be placed in the appropriate archives which are maintained by the Compliance Officer. This ensures that the Company complies with the appropriate record retention requirements of the MFSA.

The MFSA may at any time require the register to be produced for its review. The Company shall provide information on Complaints and Complaints handling to the MFSA as and when required. This data shall cover the number of Complaints received, differentiated as appropriate or as indicated in any criteria that the MFSA may from time to time establish.

8. Provision of relevant documentation

The Company has established and implemented appropriate procedures and arrangements to ensure that it deals promptly and reasonably with Eligible Complainant's complaints. The Company's Complaints Handling Policy is available and can be forwarded, free of charge, upon request.



Moreover, the Complaints Handling Policy is published on the Company's website.

9. Company's contact details

Eligible Complainants are advised to direct their Complaint to the Company's Client Service Desk by telephone (+356 27327386) or by email to complaints@amagiscapital.com

Appendix I
Revision History Log

Version	Section	Description of Amendments	Date Amended (MM/YYYY)	Date Approval (DD/MM/YYYY)	Preparer	Reviewer
1	General	Finalisation of the document	11/2018	19/11/2018	Antonio Giannino	Board of Directors
2	Appendix I	Inclusion of a Revision History Log	05/2019	16/05/2019	Antonio Giannino	Board of Directors
3	General	Updates in corporate structure, revisions in the complaints handling process in accordance with legislative updates	08/2023	07/08/2023	Enrico Amarante	Board of Directors



APPENDIX II – COMPLAINTS HANDLING FORM

Name of Eligible Complainant	
Date when the complaint was received	
From whom was the complaint received? <i>[insert name and contact details]</i>	
How was the complaint submitted? Verbal or in writing? <i>[if in writing all back up documentation, including original letters must be submitted together with this form]</i>	
Brief description of the Complaint	
Name of the officer receiving the complaint	
Was the complaint escalated to the Compliance Officer and the Board Members? <i>[If yes include date]</i>	
Comments provided by the Company to the Eligible Complainant and replies therefrom	
Proposed resolution of the complaint and feedback from Eligible Complainant	
Additional comments and feedback by the Board	
Was the complaint closed?	
Completed by:	
Signature:	
Date	