

COMPLAINTS HANDLING PROCEDURE

NORTHERN TRUST GLOBAL SERVICES SE

At Northern Trust Global Services SE (hereafter referred as NTGS SE) we consider that, as a service organization, Client service and satisfaction are of prime importance and we place the interests of our Clients first in every action we take. While NTGS SE makes all the possible efforts to perform its regulated activities in a manner that avoids Client complaints, we also recognize that these may occur in the business life of any corporate entity.

To address any complaints you may have, we have a process in place to assist you in resolving your concerns in a professional, open and efficient manner.

Complaint definition

NTGS SE defines a Client complaint as being *any oral or written expression of dissatisfaction, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination, which: alleges that the plaintiff has suffered (or may suffer) financial loss, material distress or material inconvenience; and that there is an explicit or implicit expectation by a Client that we NTGS SE will take action to remediate them and or prevent recurrence.*

Complaint Management Procedure

In accordance with its obligations as not ably set forth by the Luxembourg Commission de Surveillance du Secteur Financier (hereafter referred as CSSF) Regulation No 16-07 relating to out-of-court resolution of complaints and Circular CSSF 17/671 specifying certain aspects of this CSSF Regulation and repealing the Circular CSSF 14/589, as well as Circular CSSF 19/718, NTGS SE has deployed a governance framework surrounding the management of Client complaints to ensure that the latter are treated objectively, fairly, in a consistent way and timely manner.

Moreover, NTGS SE has designated amongst its Authorized Managers a person who is ultimately in charge of addressing Client complaint.

Any complaint can be raised to the attention of NTGS SE through one of the channels offered by the following contact details (either by mail, email or phone):

Northern Trust Global Services SE
10 Rue du Château d'Eau
L-3364 Leudelange
Luxembourg
Phone: (+352) 28 29 40 00
Email: EMEA_Regulatoryliaisonoffice@ntrs.com

Upon receipt of your complaint, NTGS SE commits to acknowledge receipt **within maximum ten business days**. Our acknowledgement message will indicate the name and direct contact details of the person in charge of managing it.

The resolution of your complaint **shall not exceed one month from the date of receipt** even if, in certain circumstances notably related to the complexity of the case, a longer period may be necessary and in such as case we commit to inform you in writing of the causes of the delay and the date at which the examination is likely to be completed.

In case the complainant does not receive a satisfactory response, the complainant has the right to address its complaint to the Authorized Manager in charge of complaints. The complainant shall in such case send a letter at the abovementioned address and addressing it to the Authorized Manager in charge of Complaints.

Contacting the CSSF

We would like to bring to your attention that if you have not received an acknowledgement of receipt, an answer or a deemed satisfactory response to your complaint within the delays which are reported herein, you can file a request for out-of-court complaint resolution with the CSSF.

The escalation procedure before the CSSF and required forms are available on the website of the CSSF:

[CSSF - Réclamation](#)

[Formulaire réclamation générale](#)

The complaint must in such case be submitted to the CSSF within one year of the initial submission of the complaint to NTGS SE.