

Officium Asset Management

Claims Management Policy

Regulatory contexts and objectives:

Instruction 2012-07 and the reference texts: paragraphs 313-8 of the general regulations of the AMF concern the treatment of claims and specify the information which must be given concerning the means of treating claims to the client of the investment services provider or the financial investment advisor or the partner in the real estate investment company (hereinafter called the 'client').

This instruction also details: the procedures to be established in order to guarantee an efficient, equitable and harmonised treatment of claims and the identification of possible dysfunctions and the taking of appropriate corrective actions.

The X procedure aims to describe the means of enumerating, treating and dealing with claims formulated by clients, whatever the causes and consequences may be, if they risk affecting the company's operating account.

Moreover, this procedure comes under the conformity dispositions required by the regulator, notably paragraphs 313-71 of the General Regulations of the AMF, which stipulates that a management company must set up a procedure enabling collaborators to inform the Compliance and Internal Control Officer of their "questions concerning identified dysfunctions".

1. Information about and access to the system for dealing with claims

A claim is a declaration manifesting the discontent of a client with regard to a professional. A request for information, a point of view, clarification, service or help is not a claim. Officium Asset Management responds to a client's requests for information on the steps being taken to deal with his or her claim.

In the case of a rejection or refusal to uphold the claim either in whole or in part, Officium Asset Management will specify in its response sent to the client the legal remedies available to him or her.

A summary of observations made and actions taken or remaining to be taken is supplied every year to the General Direction by the Compliance and Internal Control Officer or their delegate by means of an *ad hoc* note.

To contact Officium Asset Management:

In writing:

18 rue de Tilsitt

75017 Paris

By e-mail to the Compliance and Internal Control Officer:

rcci@officium.com

To contact the AMF mediator:

In writing:

Médiateur de l'AMF

Autorité des Marchés financiers

17 place de la Bourse

75082 Paris Cedex 02

By e-mail:

www.amf-france.org/affiche_page.asp?id_Tab=1&lang=fr&urldoc=mediateur#charte

Access to the formula requesting mediation

2. Organization of the treatment of claims

Officium Asset Management has set up an organization for the treatment of claims which:

Enables the client to present their claim to their usual interlocutor, the management team, and if a satisfactory response is not received from the latter, to the person responsible for the management or to the Compliance and Internal Control Officer.

Assures the respect of the treatment deadlines communicated to the client, namely:

- Ten working days at most from reception of the claim, for acknowledged receipt of it, except if the answer is given to the client within the deadline;
- Two months at most between the date of reception of the claim and the date the answer is sent to the client except for special circumstances duly justified;

Foresees the modalities for recording claims and for the follow-up of their treatment 'Register of Claims'

3. Follow-up and treatment of claims

Taking into account dysfunctions identified through claims

All claims received by registered letter, telephone or e-mail from clients must be communicated as a copy to the Compliance and Internal Control Officer, whatever their nature or impact.

- a) Preparation of the answering letter: the answer to the claim must be made in consultation with the Direction. All answering letters to a claim must be signed by one of the directors.
- b) Sending the answer to the client: the letter must be sent by registered mail with acknowledgement of receipt. Filing the answering letter in the client's file and sending a copy of the answer to the person responsible for conformity and internal control (BCCI).
- c) Centralization of claims and their answers: claims and their answers are then centralized in a 'Register of Claims' spreadsheet for follow-up and control by the BCCI. The latter shall put its stamp on the spreadsheet.

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