

THE GENESIS EMERGING MARKETS INVESTMENT COMPANY, SICAV-SIF

*Société d'Investissement à Capital Variable – Fonds
d'Investissement Spécialisé*

The “Company” or the “Fund”

COMPLAINTS HANDLING POLICY AND PROCEDURE

This policy has been approved by the board of directors of the Company (the “Board of Directors”) in fulfilment of the requirements of CSSF Regulation 16-07, section 2, concerning the extra-judiciary resolution of complaints. A copy of this policy is available to shareholders, on request.

Due to the restricted and institutional nature of the share register, shareholder complaints are rarely received.

1. Filing a complaint

The complaint shall be addressed through the following means:

- **Simple or registered mail to the following address:**
THE GENESIS EMERGING MARKETS INVESTMENT COMPANY, SICAV-SIF
80, route d’Esch
L-1470 Luxembourg
Luxembourg
To the attention of the Genesis Relationship Manager (hereinafter the “Complaints Officer”)
- **Fax to the following number:**
+352 47 40 66 6419

The following information shall be provided to ensure a prompt handling of the complaint:

- Identity and contact details of the complainant;
- Reason of the complaint;
- Where necessary, copies of any documentation supporting the complaint.

2. Complaints handling procedure

2.1 Complaint receipt

The Complaints Officer is in charge of the collection and management of the complaints handling. In all cases, shareholders may address their complaint directly to the Fund or its Board

of Directors. Therefore all complaints, regardless of how they are made (through the website, in written format by post, by telephone, etc.) which are not directly addressed to the Complaints Officer but generally addressed to the Company or through an intermediary or delegated party (in connection to services provided on behalf of the Company) should immediately be transmitted by the Complaints Officer which will address the complaint.

2.2 Acknowledgement of receipt

The Complaints Officer must send an acknowledgment of receipt in writing within (10) ten business days of receipt, unless the answer itself is provided to the complainant within this period.

The acknowledgment of receipt should inform the complainant of the name and contact details of the person dealing with the complaint.

2.3 Registration and information

The Complaints Officer will record the request in the complaints register, briefly outlining the nature of the complaint and the action/outcome agreed with the investor.

2.4 Investigation

Once received, the Complaints Officer will arrange to investigate without delay the complaint and shall collect from the employees, intermediaries or from the delegated parties all data and information that are necessary for the examination of the request.

2.5 Answer to the complainant

A clear, concise and exact response must be sent within one month of receipt. In cases where this is not possible, the shareholder must be informed of the reasons for the delay, and given a likely date by which a response can be expected.

2.6 Escalation of the complaint at a second level

Where the complainant did not obtain an answer or a satisfactory answer at the level of the Complaints Officer, he/she will have the opportunity to raise the complaint up to the level of the Board of Directors of the Company. In this respect, the Complaints Officer shall provide the contact details of the person responsible at this level.

2.7 Existence of the out-of-court complaint resolution at the CSSF

Where the complaint handling at the level of the Complaints Officer and Board of Directors did not result in a satisfactory answer for the complainant, the Company shall, in writing:

- provide the complainant with a full explanation of his/her position as regards the complaint;
- inform the complainant of the existence of the out-of-court complaint resolution procedure at the CSSF aiming at facilitating the resolution of complaints without judicial proceedings;
- provide the complainant a copy of the CSSF regulation 16-07 relating to the out-of-court resolution complaints or the reference to the CSSF website;
- indicate to the complainant the different means to contact the CSSF to file a request;
- indicate that the request with the CSSF must be filed with the CSSF within one year after the filing of the initial complaint with the Company.

2.8 Closing a complaint

Once the response letter has been sent, the client has 30 days in which to respond. Provided that a negative response has not been received, the complaint is considered to be closed after this period has elapsed.

3. Complaints reporting

Each complaint received should be recorded promptly by the Complaints Officer in the Complaints Register and sent to the CSSF on a yearly basis together with the list of third parties authorised to handle investor's complaints (if any).

The register shall include the number of complaints registered by the Company classified by the type of complaints, as well as a summary report of the complaints and the measures taken to handle them.

Both the complaints file and the register shall be kept at the Company's premises for ten (10) years after the complaint was dealt in full.

4. Communication of information to the CSSF

The CSSF may receive complaints from clients of the Company for intervening with the aim of settling these complaints amicably. The CSSF does, however, not act as an ombudsman in respect of client complaints which are sent directly to them. They will forward the complaint to the Company.

Should a complaint be forwarded to the Company by the CSSF, the Complaints Officer will immediately send an acknowledgement letter confirming receipt of the complaint. The complaint will then be dealt with in accordance with the process detailed in this Policy and Procedure.

In case a complaint has been filed with the CSSF and the supervisory authority has requested the Company to take position on the facts or opinions presented by the complainant or to

provide information or documents, the Company undertakes to make its best effort to communicate to the CSSF the requested information or documents within the requisite time-period.

Where the CSSF concludes that the complaint is totally or partially justified and asks the Company and the complainant to settle their dispute, the Company shall undertake to find with the complainant a common ground to put an end to the complaint.

5. Complaints monitoring

Complaints shall be assessed by the Company on an-going basis to enable the identification of systemic or recurring problems, as well as any potential legal and operational risks, for example:

- by analysing the causes of the individual complaints in order to identify the root causes common to certain types of complaints;
- by considering whether these root causes may also affect other processes or products, including those to which the complaints do not relate directly; and
- by considering what actions the Company or the Manager may need to take to address these root causes.

The Board of Directors

9th March 2018