

TISHMAN SPEYER

Complaints handling policy

TISHMAN SPEYER

History

Version	Release Date	Description	Amended by	Reviewed by	Approved by
1.0	20.09.2019	IFM Complaints handling	IFM Marketing and Distribution, IFM Risk and Compliance	Conducting officers	Board of Managers on 20 September 2019
2.0	30.09.2020	IFM Complaints handling	Compliance	Conducting officers	Board of Managers on 30 September 2020
3.0	30.09.2021	IFM Complaints handling	Compliance	Conducting officers	Board of Managers on 30 September 2021
4.0	30.09.2022	IFM Complaints handling	Compliance	Conducting officers	Board of Managers on 30.09.2022

Appendices

Reference	Description
1	Complaints handling team (including third parties authorized to handle complaints)
2	CSSF complaints reporting template

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2. Glossary

Term	Description
“AIF”	Alternative investment funds managed by the IFM
“AIFMD”	Directive 2011/61/EU on alternative investment fund managers, as amended
“AIFM Law”	Luxembourg law of 12 July 2013 on alternative investment fund managers, as amended
“Board” or “Board of managers”	Management body or the management board of the IFM
“Branches”	Any existing branch of the IFM
“Circular”	CSSF Circular 18/698 on the authorization and organization of Luxembourg investment fund managers and AML requirements applicable to investment fund managers and registrar agents, as amended
“Complainant”	Any natural or legal person having filed a complaint with the IFM
“Complaint”	Complaint filed with the IFM to recognise a right or to redress a harm
“Complaint Officer”	The person at the IFM in charge of complaints handling
“Conducting Officer”	Officer appointed by the IFM and fulfilling one or several of management functions as required under the AIFM Law
“CSSF”	The Luxembourg supervisory authority of the financial sector (<i>Commission de Surveillance du Secteur Financier</i>)
“Distributor”	Any entity – either a member of the Tishman Speyer Group or an external entity acting as “distribution intermediary” – which takes steps pursuant to the marketing of one or more AIF(s) managed by the IFM
“IFM” or “Company”	Tishman Speyer Europe S.à r.l. qualifying and authorized by the CSSF as an alternative investment fund manager under the AIFM Law and which also holds a MiFID top-up license as foreseen by Article 5(4) of the AIFM Law
“Investor(s)”	Individual unitholder/shareholder/interest holder or group of unitholders/shareholders/interest holders in an AIF or a Mandate

	managed by the IFM
“Manager”	Duly appointed member of the Board of Managers
“Mandates”	Discretionary portfolio mandates managed by the IFM
“Policy”	This complaints handling policy
“Regulation”	EU Commission delegated regulation (EU) No 231/2013
“Senior Management”	The Conducting Officers of the IFM

3. Introduction

4.1 Background

Tishman Speyer Europe S.à r.l. (the “**IFM**”) is a private limited liability company (*société à responsabilité limitée*) which acts as Alternative Investment Fund Manager authorized under Chapter 2 of the Law of 12 July 2013 (the “AIFM Law”) and whose authorization covers, in addition to the activities referred to in Annex I of the AIFM Law, also one or several services provided for by article 5(4) of the AIFM Law, i.e. discretionary portfolio management services, investment advice, safekeeping and administration in relation to shares or units of collective investment undertakings and reception and transmission of orders in relation to financial instruments. The IFM is authorized and supervised by the Commission de Surveillance du Secteur Financier (the “**CSSF**”).

The aim of this Policy is to specify the IFM’s governance and procedures to be followed for reasonable and prompt Complaints handling and resolution in order to ensure that a Complainant expressing dissatisfaction is listened to and treated with particular care.

The Board of managers of the IFM has approved the following Complaints Handling Policy (the “**Policy**”) with respect to its activities as alternative investment fund manager.

The person designated by the Board to act as complaints handling officer (the “**Complaint Officer**”), has the appropriate professional experience and the required profile. The role of the Complaint Officer is to investigate Complaints in sufficient details with the Compliance department, in order to be able to provide a meaningful response to the issues raised in the Complaint. Furthermore, the Complaint Officer shall analyse the data relating to complaints handling on a permanent basis in order to enable the identification and treatment of any recurring or systematic problem, as well as any potential legal and operational risks. The name of the Conducting Officer responsible for Complaint handling at the IFM and the Complaint Officer are referenced in Appendix 1.

This Policy is also applicable to the IFM’s Branches, which are made aware of its existence and of any updates to it by the Complaint Officer. The IFM Branches shall handle and resolve Complaints related to AIFs / Mandates managed by the IFM as specified in this Policy.

This Policy is reviewed and updated at least annually by the Compliance department of the IFM.

4.2 Applicable Regulations

The IFM is subject to the AIFM Law, the Regulation as well as all relevant applicable laws, regulation and circulars enacted by the CSSF.

4. Complaints handling

4.1 How to complain

A Complainant must submit his/her Complaint in writing by mail or e-mail to the Complaint Officer (whose contact details are disclosed in Appendix 1 below). If a Complaint is transmitted to an employee of the IFM or its Branches or a Distributor, the Complaint will be sent to the Complaint Officer. Where Complaints are expressed verbally, the Complainant should thereafter evidence in writing his/her Complaint and address it to the attention of the Complaint Officer.

4.2. Information to be provided

The Complainant is requested to provide the following information to ensure the prompt handling of his/her Complaint:

- Firstname(s), lastname(s) of the Complainant
- Contact details (postal address, e-mail and telephone number) of the Complainant
- Capacity of the Complainant (e.g. owner, representative, officer or lawyer)
- The relevant investor account number (if any)
- Fund, sub-fund and class (if any) concerned
- Description of the Complaint
- Any supporting documents to the Complaint (including correspondence) or relevant information

4.3. Handling of the Complaint

Acknowledgment

Following the receipt of a Complaint to the Complaint Officer, the IFM endeavors to promptly contact the Complainant to acknowledge receipt of the Complaint within 10 business days of the receipt of the Complaint and/or provide a response to the Complainant.

Response

The Complainant will receive:

- a formal written response within one month from the date of the sending of the Complaint; or
- explanations on why the IFM cannot provide an answer within such period and indicate a timeframe for the resolution of the Complaint.

Escalation

If the Complainant is not satisfied by the resolution of his/her Complaint or has not obtained a response, the Complainant may contact the Conducting Officer responsible for Complaint Handling (whose details are provided in Appendix 1 below), who will handle the Complaint.

4.4 How to file for out-of court Complaint resolution

In case the Conducting Officer does not satisfactorily respond to the Complainant, the Complainant may have recourse to the out-of-court complaint-resolution procedure to have the Complaint resolved by the CSSF within a period of 1 year after he/she filed the Complaint with the IFM.

The Complainant must file his/her complaints to the CSSF in writing:

- by filling in the [online complaint form](#) where all relevant documents can be attached; or

- by sending the completed [complaint form](#) (PDF):

either by mail (simple mailing, no registered letter required) to the following address:

Commission de Surveillance du Secteur Financier
Département Juridique CC
283, route d'Arlon
L-2991 Luxembourg

or by fax using the following number: (+352) 26 25 1-2601;

or by email to the following address: reclamation@cssf.lu

The out-of-court resolution of disputes is free of charge.

The Complaint shall be filed together with copies of all relevant documents in English, French, German or Luxembourgish. The extrajudicial resolution procedure will, in principle, be conducted in one of the above-mentioned languages in which the Complaint was filed with the CSSF.

Further information on the procedure for filing an out-of-court complaint with the CSSF can be found on the CSSF website under: <https://www.cssf.lu/en/customer-complaints/>.

5. General principles

The Policy is based on the following principles:

- The protection of Investors against any unfair treatment and ensuring that each Investor's Complaints are adequately and fairly addressed in a timely manner.
- Any Complaint received by the IFM or its Branches shall be reported to the Complaint Officer. The IFM will maintain a log and report on all Complaints received.
- Complaints are only considered to be a Complaint when addressed in writing (by letter to the IFM's registered office by an Investor) and in case of a financial impact.
- If a Complaint is received by the IFM, the Complaint Officer shall forward the Complaint to the concerned entity, team, branch or service provider, as appropriate, depending on the subject of the Complaint.
- The draft response, prepared by the affected entity, team, branch or service provider, shall be sent back to the Complaint Officer for review and approval.
- When the drafting of a response and/or settlement of the Complaint by the affected entity, team, and branch or service provider takes more than five days, an acknowledgement of receipt is sent by the Complaint Officer to the Complainant, indicating that his/her/its Complaint is under investigation and that it will be answered in a timely manner. Furthermore, the contact details of the Complaint Officer are indicated.
- On a quarterly basis, the Complaint Officer will report to the Board the nature of the Complaints received and the actions undertaken to resolve the Complaint(s).
- All Complaints are recorded by the IFM in a Complaints log.
- The IFM shall provide Investors with the procedure for handling complaints free of charge upon request.

Where the IFM shall outsource services/activities to a third-party administrator, it is the IFM's responsibility to ensure that the third party administrator complies with this Policy.

6. Annual reporting to the CSSF

On a yearly basis, the Conducting Officer responsible for Complaint handling at the IFM must communicate to the CSSF a table including the registered Complaints (cf. Appendix 2). The report covers all Complaints faced and handled during the previous calendar year. Moreover, a summary report shall be provided stating the Complaints, measures taken, the reasons for the Complaints as well as the progress made in their handling. Both documents are submitted to the CSSF within 5 months following the end of the financial year of the IFM.

Closed Complaints shall be retained for a period of 5 years.

Appendix 1: Complaints handling team (including third parties authorized to handle complaints)

Name of the Conducting Officer responsible for Complaints handling:

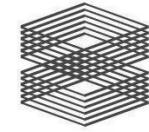
Josephine Andonissamy (IFM)

Tishman Speyer Europe S.à r.l.
34-38, Avenue de la Liberté, L - 1930 Luxembourg
email address: JAndonis@tishmanspeyer.com

Name of the person in charge of Complaints handling (the Complaint Officer):

Ifeanyi Uyanneh (Tishman Speyer Properties UK Limited)

Tishman Speyer Properties UK Limited
10 Bressenden Place, London, SW1E 5DH
email address: IUyanneh@TishmanSpeyer.com



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Appendix 2: CSSF Complaints reporting template

Type of Complaint	Summary report on Complaint	Reason for Complaint	Measures taken	Opening date	Closing date