



COMPLAINTS HANDLING POLICY

2025

## 1. Introduction

Oakley Capital Manager S.à r.l. (“the Firm” or “the Company”) is an alternative investment fund manager pursuant to Chapter 2 of the Law dated 12 July 2013 relating to alternative investment fund managers.

The Firm has implemented complaints procedures to ensure that it handles complaints efficiently as part of an impartial process, as required under:

- the CSSF Circular 17/671 specifying CSSF Regulation 16-07 on out-of-court resolution of complaints;
- the CSSF Circular 18/698;
- the CSSF Regulation Nr 16-07 relating to the out-of-court resolution of complaints (the “CSSF Regulation Nr 16-07”);
- the Alternative Investment Fund Manager Directive (AIFMD).

## 2. Complaints Handling process

The Firm has prepared a summary of its complaints handling policy, which is set out,

### 2.1 Complaint notification process

A complaint or issue of dissatisfaction should be submitted to the Firm, free of charge, in the following ways to the Firm’s Complaints Handling Officer, in English or French:

**In writing to:**

Giada Alemanno, Oakley Capital Manager S.à r.l at  
26A Boulevard Royal - L-2449 – Luxembourg, 3<sup>rd</sup> Floor,

**By phone:** T: +352 621 576 784

**By email:** [giada.alemanno@oakleycapital.com](mailto:giada.alemanno@oakleycapital.com)

### 2.2 Acknowledgement

We will provide written acknowledgement of your complaint **within two business days** from the receipt of complaint and will keep you informed of our progress in reviewing your complaint.

### 2.3 Resolution

The Complaints Handling Officer or the assigned responsible party will provide you with a resolution within **seven business days**. If your complaint requires further review and we are unable to respond to you with a resolution within seven business days, we will inform you of this. We will provide you with details of who is responsible for handling your complaint at Oakley Capital Manager S.à r.l. as they will provide you with updates.

In case of further review required we will provide you with a written final response within eight weeks of the date of your original complaint. Within this written response we will provide details of any findings made as a result of our investigation into your complaint and whether any remedial action will be taken. We will ask you to confirm if you are satisfied with our conclusion.

### 3. CSSF out of court complaint resolution

If, after receiving our final written response, you feel that you did not receive a complete, clear and justified response, you have the right to raise a case with the CSSF to pursue for out of court resolution within one year of the date you filed the complaint with us, in line with the process described in the CSSF website: [Customer complaints – CSSF](#).