

# Group Complaints Handling Policy

## Astanor Ventures

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Version 1.0	November, 2021	Created by Antoine Cuny, Compliance Manager Reviewed by Hans Marteau, Partner
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## 1. Astanor

Astanor is an impact investor, delivering financial, social, and environmental returns in equal measure. We believe it is both possible and necessary to scale a regenerative, connected agriculture and food system which protects the planet and supports a healthy, sustainable global population. As such, Astanor brings together capital, deep sector knowledge and a strong network of entrepreneurs, impact investors, technologists, scientists, farmers, chefs, policy makers and food lovers to give rise to a future of food that is nourishing, regenerative, scalable, trusted, and delicious.

## 2. Objectives

This policy aims at implementing an appropriate internal structure and defining the internal responsibilities and instructions for the reception and the handling of Complaints (as defined below), in order to ensure that they are handled in a manner which is fair, objective and truth oriented.

## 3. Definitions

“**Complainant**” means any natural or legal person, such as a ‘customer’ of the Fund, an investor, former investor, or actively solicited potential investor, having filed a Complaint. Complainants will be able to file a Complaint in English, French or in Dutch.

“**Complaint**” means any written complaint filed with, or addressed, to the Fund to recognise a right or to redress a harm. Complaints usually represent dissatisfaction whether expressed orally or in a written form or on behalf of an eligible complainant, about Astanor’s provision of or failure to provide a financial service or other expected service. For the avoidance of the doubt, simple information or explanation requests are not to be regarded as Complaints.

“**Complaints Filing Form**” means the form by which the Complainant can file a Complaint, a draft form which is attached as Appendix I of this Policy.

“**CSSF**” means “*Commission de Surveillance du Secteur Financier*”, the Luxembourg Financial Services Authority.

“**Fund**” means any investment fund promoted and / or managed by Astanor from time to time.

“**FSMA**” means “*Autorité des services et marchés financiers*”, the Belgium Financial Services Authority.

## 4. Legal entities

Any reference to Astanor shall be understood as the Astanor Entities, as defined in the List of Astanor Entities, as amended from time to time.

In the event of any conflict or inconsistency between the terms and conditions hereof and any terms or conditions set forth in the constitutive document of an Astanor Entity, the terms and conditions set forth in the Astanor Entity’s constitutive documents shall prevail.

## 5. Complaints Handling Procedure

Any complaint concerning the Astanor Entity must be sent using the Complaints Filing Form ([Annex I](#)) to:

*Astanor Ventures  
To the attention of the Compliance Officer  
480 Avenue Louise 1050 Brussels - Belgium*

Astanor will treat your complaint as follows:

1. An acknowledgement letter or email will be sent to you within ten (10) business days as of the receipt of the Complaint if the Complaint cannot be settled before this timeline.
2. An update letter or email will be sent to you one month and every four weeks thereafter to inform you of the progress of your Complaint.
3. A final letter will be sent to you to inform you on the outcome of our investigation and the actions taken to resolve the Complaint.

## **6. Escalation process**

Where a Complainant did not receive a response within one (1) month of a Complaint being submitted to Astanor, the Complainant can refer its Complaint to the local relevant financial authorities where the Fund operates.

For investors of Luxembourg-based Astanor Entities:

This Policy complies with the requirements of CSSF Regulation 16-07 relating to the out-of-court resolution of Complaints.

Astanor hereby informs its Luxembourg-based Astanor Entities investors of the existence of the out-of-court dispute settlement procedure with the Commission de Surveillance du Secteur Financier (the “CSSF”), the Luxembourg financial services regulator. For the avoidance of doubt, this only concerns Astanor Entities which are Luxembourg-based investment fund vehicles.

The escalation process therein suggests that, where a Complainant did not receive a satisfactory response within one (1) month of a Complaint being submitted to Astanor Ventures, the Complainant can refer their Complaint to the CSSF by the following means:

*Either by mail addressed to:*

**Commission de Surveillance du Secteur Financier**

283, route d’Arlon

L-2991 Luxembourg

Grand Duchy of Luxembourg

*or by e-mail at the following address: [direction@cssf.lu](mailto:direction@cssf.lu)*

For customers of Belgian-based Astanor Entities:

Astanor hereby informs its Belgium-based Astanor Entities investors of the existence of the out-of-court dispute settlement procedure with the “FSMA”, the Belgium financial services regulator. For the avoidance of doubt, this only concerns Astanor Entities which are Belgium-based investment fund vehicles.

The escalation process therein suggests that, where a Complainant did not receive a satisfactory response within one (1) month of a complaint being submitted to Astanor, the Complainant can refer its Complaint to the FSMA by the following means:

The escalation process suggests:

- The possibility to seek remediation via the Ombudsfina, [www.ombudsfina.be/](http://www.ombudsfina.be/)
- The possibility to reach out directly to the FSMA, by mail addressed to:

FSMA

AUTORITÉ DES SERVICES ET MARCHÉS FINANCIERS  
Rue du Congrès 12-14  
1000 Brussels – Belgium

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This document will be reviewed at least one time a year.

*Last updated: September 2022.*

*This Policy remains amendable, as necessary, in order to comply at any time with any changes at Astanor or with any of Astanor investment vehicle structure, along with any and all regulations and or guidelines governing any subject covered by this Policy.*

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Annex I: Complaint filing form - ASTANOR VENTURES

DATE OF THE COMPLAINT FILING	
NAME OF THE FUND CONCERNED	

NAME	
ADDRESS	
PHONE NUMBER	
EMAIL ADDRESS	
DATE OF INCIDENT	
NAME OF PERSON THE COMPLAINT IS AGAINST, IF APPLICABLE	
COMPLAINT DETAILS	

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