

BBH LUXEMBOURG FUNDS

Société anonyme - Société d'Investissement à Capital Variable

Registered office: 6 route de Trèves, L-2633 Senningerberg, Grand-Duchy of Luxembourg
Luxembourg R.C.S.: B 143.956

COMPLAINTS HANDLING POLICY

Policy Name: Complaints Handling Policy
Approved Date: November 2017

In compliance with the provisions of CSSF Circular 12/546, the board of directors of BBH Luxembourg Funds (the “**Fund**”) relies on its management company, FundRock Management Company S.A., to perform the duties as a complaints officer for the Fund who will oversee the handling of all complaints submitted by the Fund’s investors. The Management Company will receive support from J.P. Morgan Bank Luxembourg S.A., the Luxembourg-based administrator of the Fund (the “**Administrator**”) and from Brown Brothers Harriman & Co., the Fund’s principal distributor, with respect to the processing and resolution of investor complaints. The Administrator is authorized to handle complaints submitted by the Fund’s investors. Information regarding the handling of complaints procedures shall be made available to investors free of charge.

In accordance with CSSF Regulation N°13-02, a “**complaint**” in the frame of the present policy shall mean a “*complaint filed with a professional to recognise a right or to redress a harm*”. Thus, simple requests for information or clarification cannot be considered as complaints.

In principle, all complaints are to be handled by the Management Company although it is acknowledged that in some cases the relevant complaint receiving party may resolve the complaint themselves without involvement of the Management Company. The Complaints Officer, to the extent practicable shall be informed of such complaints.

Complaints must be addressed **in writing** by e-mail to the Management Company (FRMC_TA@FundRock.com) or any representative of the Fund, or by letter to the Fund’s registered office in Luxembourg. Furthermore, the Management Company will also address complaints which have been forwarded to it by the Fund’s service providers or by the CSSF.

A complaint can be brought on behalf of an eligible complainant. The complainant is an eligible complainant if he/she/it;

- (a) is or has been an investor in the Fund; or
- (b) is a potential investor in the Fund who has experienced pre-contractual difficulties.

The Management Company will, upon receipt, acknowledge receipt of the complaint to the issuer including a deadline for response. The following process will be observed:

- The Management Company shall investigate the complaint in compliance with the present policy.
- Once the issue has been appraised and investigated, the client shall be contacted directly in order to solve the problem or to explain the process that will need to be followed in order to solve the issue.
- All complaints shall be handled within a reasonable timeframe. In case such timeframe cannot be respected or met, the client shall be advised accordingly.
- All 'serious complaints' (i.e., that might have a material impact on the Fund, the investor or lead to reputational damage of any of the service providers) will be communicated and discussed with the Board.
- When handling a client complaint, the Management Company can rely on the services offered by other departments such as the legal department of the Fund's promoter or the Administrator.
- In all cases the client will receive a written explanation.
- The Management Company will maintain a client complaint log, , which is a recurring topic during the regular meetings of Management Company and the quarterly Board meetings of the Fund.

Upon receipt, complaints are to be recorded and forwarded without delay to the Management Company. Complaints received by the Administrator will be mentioned in both the monthly management report made by the Administrator to the Management Company, and the quarterly Board presentation materials. The Management Company will provide a summary of complaints and their follow-up in a report to the Fund's Board of Directors at its quarterly meetings, or earlier if there is significant reputational risk to the Fund.

On an annual basis, the Management Company will provide the CSSF with an annual statement setting forth (i) the number of complaints submitted by investors for the preceding year, (ii) the reasons for each complaint, and (iii) the disposition of each complaint.

Revision History

Issued : September 2015

Revised : September 2016

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