

# BEMO Europe Complaints Management

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## Policy

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## 1 Introduction

BEMO EUROPE BANQUE PRIVÉE (hereafter referred as “**BEMO**”, “**BEMO Europe**” or the “**Bank**”), is a public limited company (*société anonyme*) governed by the laws of the Grand-Duchy of Luxembourg. It is registered with the Registre de Commerce et des Sociétés de Luxembourg under number B176452, having its registered office at 26, Boulevard Royal, L-2449 Luxembourg.

The Bank is authorized by the CSSF to carry out its activities pursuant to Article 2 of the Law of 5 April 1993.

BEMO Europe with the agreement of the *Commission de Surveillance du Secteur Financier* (“**CSSF**”) and the *Autorité de Contrôle Prudentiel et de Résolution* (“**ACPR**”) has a branch in France, denominated as BEMO EUROPE BANQUE PRIVÉE – succursale de Paris (also known as the “**Branch**”). It is registered under Parisian Registre de Commerce et des Sociétés under number 998269518 / CIB 17619 having its registered office at 63, Avenue Marceau, 75116 Paris.

### 1.1 Purpose of this Policy

This Complaints Handling Policy (this “**Policy**”) describes the in-house process for handling complaints against BEMO. Furthermore, this Policy presents the roles and responsibilities within BEMO for Complaints Handling matters.

This Policy is drafted based on the legislation and regulations relevant to financial markets, the applicable requirements under the Luxembourg Law of 5 April 1993 on the financial sector, as amended and the applicable rules set out by the CSSF. It fulfils in particular, the requirements of CSSF Circular 17/671, CSSF Regulation (Art 16) 16-07 and CSSF Circular 19/718. It also takes due account of the ACPR Recommendation 2022-R-01 of May 9th 2022

This Policy is made available to clients through BEMO website and can be provided upon request.

### 1.2 Scope of the Policy

This Policy is applicable to the Bank and the Branch and to all employees engaged in activities that presume communication and cooperation with Clients.

## 2 Definition of a Complaint

For the purpose of this Policy, a “complaint” is a statement communicated in a writing to the person responsible for complaint handling (cf. section 4.1) which aims to express dissatisfaction with or declare specific inappropriate conduct by BEMO in relation to its services.

### 3 Roles and Responsibilities

#### 3.1 All employees

Upon receipt of a complaint, whether written or oral, the employee receiving the complaint must inform immediately the Member of General Management (“**MGM**”) in charge of complaints management who will inform the MGMs of the Bank.

#### 3.2 Compliance

BEMO’s Compliance department maintains records of all complaints, together with the response or a note on the settlement, in a Complaints Register (see attached template).

#### 3.3 General Management

The General Management (*Direction Générale*) of the Bank is responsible for the implementation of this Policy as outlined in CSSF Regulation 16-07.

The MGM of the Bank responsible of complaints management is:

MGM	Full Name	Email Address	Phone Number
Director of Human Resources	Mr Amine BECHARA	a.bechara@bemo.lu	+352 691 226 321

#### 3.4 Complaints-Handling responsibilities

The Chief Compliance Officer have the full responsibility of BEMO’s complaints handling process and should maintain an up-to-date register of all complaints as well as providing the MGM and Board of Director with a status on the complaints.

### 4 Complaints Handling Process

BEMO is following the following internal processes regarding customer complaints.

#### 4.1 Expressing a Complaint

A complaint can be expressed in a written form (mail or electronic communication) from anyone having a relationship with BEMO who wishes to express dissatisfaction with the services of BEMO. The complaint can be submitted free of charge.

The client can contact BEMO directly to address any complaints using the following communication details:

- By email at: [compliance@bemo.lu](mailto:compliance@bemo.lu) ;

- By letter to the head office:  
BEMO Europe Banque Privée  
To : « Compliance Department »  
26, Boulevard Royal  
L-2449 Luxembourg

For the purpose of submitting a complaint, the following information should be provided:

- Full name of the complainant;
- Contact details;
- Account numbers (if applicable);
- Details regarding the complaint;
- Relevant document(s);
- Any other detail(s) of relevance regarding the complaint.

#### 4.2 Receipt, Acknowledgement and Registration of Complaints

BEMO will acknowledge receipt of the complaint within a period which shall not exceed 10 business days after receipt stating the name and contact information of the person in charge of the request.

Following receipt of a complaint, BEMO is responsible for the prompt and adequate registration and documentation of the complaint in the Complaints Register, which shall document information regarding the complaint, owners, timelines and ultimate resolution.

#### 4.3 Investigation and Escalation

After receiving a complaint, the CCO will be in charge of analysing the details and investigating the validity of the information received. The CCO will gather all the evidence related to the complaint. If necessary, the CCO will bring the case for discussion to the Board of Directors for escalation purposes, depending on the nature and criticality of the case. The CCO has the right to receive support from an external advisor regarding the resolution of the complaint, who may be the lawyers of BEMO.

#### 4.4 Response to Complainant

BEMO aims to provide a response within a period of time that shall not exceed one calendar month after the receipt of the complaint. In case an answer cannot be provided within this time, the complainant will be accordingly informed of the delay and receive a new indicated date for an expected response.

#### 4.5 Complaint escalation to MGM

If the complainant is not satisfied by the response or if he did not receive any answer from BEMO, a complaint escalation can be addressed to the MGM of the bank at the following address:

BEMO Europe Banque Privée  
To the General Management  
26, Boulevard Royal

L-2449 Luxembourg

A response from the MGM in charge of complaints management (cf section 3.3) will be provided to the complainant within a period which shall not exceed 1 month after receipt of the complaint by the General Management.

#### 4.6 Out-of-court complaint resolution

In case the complainant is not satisfied with the answer provided, the CCO will provide him/her with a full explanation of their position as regards the complaint and inform him/her in writing of the existence of the out-of-court complaint resolution procedure at the CSSF and will send him/her a copy of CSSF regulation 16-07 or the reference to the CSSF website, as well as the different means to contact the CSSF to file a request.

The complainant shall be informed that such out-of-court complaint resolution procedure at the CSSF must be introduced within one year from the date she/he introduced the complaint with the Bank. A copy of the response must be sent by or forwarded to BEMO's Compliance department and a record thereof will be maintained.

In case of force majeure, communications should be expected from the CSSF regarding the best ways to get in touch with it regarding complaints.

#### 4.7 Documentation

All complaints must be recorded by the CCO within 7 calendar days into the Complaints Register. The CCO must ensure that the complaint, response and related documentation is retained.

The details of the complaint resolution procedure and the information on the CSSF acting as an out-of-court complaint resolution means shall be published in a clear and easily accessible manner via the BEMO website where it will remain available [www.bemo.lu](http://www.bemo.lu).

#### 4.8 Data Confidentiality

Employees should be aware that the handling of complaints might entail the processing and communication of confidential data. Employees shall exercise due care, in order to maintain information barriers and avoid that such data is disclosed to non-authorized persons. In the case of doubts or questions in relation thereto, employees shall contact BEMO's Compliance department.

#### 4.9 Reporting

The Compliance function of BEMO will report to the General Management and Board of Directors on complaints entered into the Complaints Register and will ensure an effective monitoring of the corrective measures taken and provide updates accordingly.

Furthermore, the CCO of BEMO shall communicate to the CSSF, on an annual basis, the number of complaints registered by BEMO, the nature of complaints, as well as a summary report of the complaints

and of the measures taken to handle them. Generally, this reporting is part of the annual report on the Compliance function and/or a separate reporting.

#### 4.10 Third-Party Resolution

BEMO may authorize third-parties to resolve complaints on its behalf. However, as of the date of this Policy, no such third-parties have been authorized.

### 5 Review and update

This Policy is subject to the periodic review of the Compliance Department and should be updated upon significant events, including, but not limited to: changes in regulatory frameworks that affect complaints management, changes in complaints management responsibilities, changes in complaints escalation process or any deficiencies identified in the course of complaints management.

### 6 Distribution

This Policy shall be distributed to all permanent and temporary employees and made available on BEMO website.

**Appendix – Complaints Register Template**