



Complaints handling Policy Deloitte Solutions

19/05/2023

Classification	Public
Audience	All relevant stakeholders
Version	2.00

Contents

Document Control Information	1
Introduction	2
Guiding principles of effective complaints handling	3
Handling a complaint	4
Our quality controls	7

Document Control Information

Document Identity

Ownership	Roland Bastin
Created by	Mouncef Dinari, Max Urbany
Storage location	Deloitte Solutions file server

Revision history

Version	Date revised	Name	Description of change
1.00	29/08/2017	Roland Bastin (Conducting Officer) Eric Centi (Conducting Officer) Pascal Eber (Conducting Officer)	Approval
1.01	21/06/2022	Roland Bastin (Conducting Officer, CRO, Complaints Officer)	Approval
1.02	16/05/2023	Juliette Fox (General Secretary)/Kassandra Tordeur	Align to CSSF Regulation N°16-07
2.00	19/05/2023	Roland Bastin (Conducting Officer, CRO, Complaints Officer)	Approval

Document Circulation

This document will be made available on the defined Storage location as unique reference for all relevant stakeholders. Electronic or paper copies may only be used temporarily and for information only purposes.

Review Cycle

This document shall be reviewed at least annually.

Introduction

Objective and purpose of the Complaints Handling Policy

Deloitte Solutions seeks to maintain its reputation as a firm delivering high quality professional services. Deloitte Solutions is also committed to maintaining its responsiveness to the needs and concerns of our clients. The Policy is designed to provide guidance on the manner in which Deloitte Solutions receives and handles complaints made against the firm, its Conducting Officers and its employees. The objective of the Policy is to assist the firm, its Conducting Officers and employees in resolving complaints in an efficient, effective and professional manner.

Background

In preparing this Policy, Deloitte has endeavoured to align our procedures with the relevant legal requirements and current best practice.

What is a complaint?

The Policy is intended to address complaints made to Deloitte Solutions. In accordance with CSSF Regulation N°16-07, a complaint 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.

Guiding principles of effective complaints handling

Deloitte Solutions shall consider the following guiding principles of effective complaints handling:

Principle	Deloitte's response
Visibility	This Complaints Handling Policy is openly available for each stakeholder.
Accessibility	<p>Our Complaints Handling Policy is readily accessible to all Conducting Officers, employees and clients via its website, and where appropriate, in brochures, leaflets and contractual documents.</p> <p>The Policy is easy to understand and includes details on making and resolving complaints. It also includes information on the CSSF acting as an out-of-court complaint resolution body.</p>
Responsiveness	Receipt of each complaint is acknowledged to the complainant immediately. Complaints will be handled in an efficient and effective manner. Complainants will be treated courteously and kept informed of the progress of their complaint throughout the complaint-handling process.
Objectivity	Each complaint is addressed in an equitable, objective and unbiased manner through the complaints-handling process.
Charges	There will be no charge to the complainant for making a complaint.
Confidentiality	Personally identifiable information concerning the complainant is actively protected from disclosure unless the complainant expressly consents to its disclosure.
Customer-focused approach	All Conducting Officers and employees of Deloitte Solutions, including the members of the Board and the executive team, are committed to efficient and fair resolution of complaints. We actively solicit feedback from our clients on a regular basis and acknowledge a client's right to complain.
Accountability	All Conducting Officers and employees accept responsibility for effective complaints handling. The Complaints Officer will ensure that, where appropriate, issues raised in the complaints handling process are reflected in employee performance evaluation.
Continual improvement	Our complaints handling process will be reviewed periodically, and at least annually, to aim to enhance its efficient delivery of effective outcomes.

Handling a complaint

How a complaint may be made

Where a complaint is about a particular engagement, product, partner or employee and you are familiar with the engagement team working on your matter, you may wish to address your complaint to an appropriate member of that engagement team by letter or email. Complaints should be made in writing so that the details of the complaint are clear and complete. If you are not sure to whom to refer your complaint, or feel it is inappropriate to address your complaint to a member of the engagement team, please write to:

The Complaints Officer:

Roland Bastin

Conducting Officer

Chief Risk Officer

Tel: +352 451 452 213

Email: rbastin@deloitte.lu

Deloitte Solutions

20 Boulevard de Kockelscheuer

L-1821 Luxembourg

Grand Duchy of Luxembourg

What information is required when making a complaint?

When making a complaint, please provide the following information:

- Your name, position and contact details;
- Your relationship with Deloitte Solutions (i.e. the nature of your engagement with Deloitte Solutions, if you are a client);
- Your contact person within Deloitte Solutions;
- The nature of the complaint (including when the conduct giving rise to the complaint occurred);
- Details of the Deloitte Solutions employee involved (if applicable);
- Copies of any documentation supporting the complaint.

Assistance with making a complaint

If you need assistance in formulating or lodging a complaint, please contact a member of the engagement team working on your matter. If this is not appropriate, please contact the Complaints Officer (contact details as provided above).

Acknowledgement of complaints

We endeavour to acknowledge all complaints immediately upon receipt and in any case, we will provide you with a written acknowledgement of receipt within a period of 10 days after receipt of the complaint. Once a complaint has been received, we will undertake an initial review of the complaint.

Your rights during the complaint process

You have the right to enquire as to the status of your complaint by contacting the Conducting Officer or employee who has been identified to you as handling your complaint.

Resolution and response to a complaint

Once we have reviewed your complaint, we will provide you with a written response. We endeavour to resolve complaints within four weeks of receiving the complaint, but this will not be possible on all occasions. Where our review exceeds four weeks, we will contact you to inform you of the reasons for the delay, and indicate to you when we expect to be in a position to complete our review of the complaint.

If you are dissatisfied with Deloitte Solutions' response, you have the right to ask for reconsideration of the response by the Complaints Officer. Such a request should be made in writing and forwarded by post or email to the address provided above.

Deloitte Solutions is responsible for:

- Gathering and investigating all relevant evidence and information on each complaint;
- Communicating in a plain and easily understandable language;

Out-of-court resolution of complaints

If, despite our best efforts, you remain unsatisfied with our response or have not received an answer to your complaint within one month of receipt of your complaint, you may refer to the Luxembourg financial regulator according to the provisions of the CSSF Regulation N°16/07 relating to the out-of-court complaint resolution.

In order to submit an out-of-court resolution of complaints to the CSSF, you must fulfil the following conditions:

- Have previously sent your complaint in writing to Deloitte Solutions' Complaints Officer registered towards the CSSF, and
- You must have not received an answer or no satisfactory answer from Deloitte Solutions' Complaints Officer within one month from the date at which your complaint was sent.

You may file your request with the CSSF within one year after the complaint has been filed with Deloitte Solutions' Complaints Officer.

Please be informed that your request must be submitted in accordance with CSSF requirements established on the CSSF website and the applicable form.

You may not submit an out-of-court resolution of complaints to the CSSF in the following cases:

- The complaint has been previously or is currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad;
- The complaint concerns the business policy of the professional;
- The complaint concerns a non-financial product or service;
- The request is unreasonable, frivolous or vexatious;
- The complaint has not been previously submitted in writing to Deloitte Solutions and the complainant must not have received an answer or a satisfactory answer from Deloitte Solutions within one month from the date at which the complaint was sent;
- The complainant has not filed a request with the CSSF within one year after s/he filed a request with the professional;
- The request handling would seriously impair the efficient functioning of the CSSF.

Once the CSSF has received a request that meets all the conditions, it will transmit a copy thereof to Deloitte Solutions and will ask Deloitte Solutions' Complaints Officer to take position within a period up to one month from the date at which the file was sent. The CSSF will inform you of this transmission.

Within three weeks after receipt of the complete request¹, the CSSF informs you and Deloitte Solutions:

- If it accepts to treat the request; or
- If it is unable to deal with the request (providing detailed explanation of the reason thereof to the involved parties).

Once the request analysis has been completed by the CSSF, it will send to the involved parties a conclusion letter with the reasons for the position taken. Namely either:

- A conclusion letter by the CSSF that the request is partly or totally justified: asking you and Deloitte Solutions to contact each other to settle their dispute in view of the reasoned conclusion and to inform the CSSF of the follow up; or

¹ This deadline remains the responsibility of the CSSF and is indicated here only for information purposes.

- A conclusion letter by the CSSF that the positions of you and Deloitte Solutions are irreconcilable or unverifiable.

In any case the conclusion reached by the CSSF after the analysis of the request may be different from the order of a court applying legal provisions. Therefore, you as well as Deloitte Solutions are free to accept or refuse to follow them as the conclusions by the CSSF are not binding. You as well as Deloitte Solutions may also seek remedies through legal proceedings, in particular, if we jointly fail to reach an agreement after the CSSF issued its reasoned conclusion.

Upon proposal of solution by the CSSF, both you as complainant and Deloitte Solutions will have to inform the CSSF whether each party decides to accept, to refuse or to follow the solution proposed by the CSSF within the timeframe defined by the CSSF in its reasoned conclusion letter.

Closing of procedure by the CSSF

The CSSF will close the procedure if one of the following occurs:

- Above situation;
- CSSF is informed that an amicable settlement between the involved parties is reached during the procedure;
- In case of a written withdrawal of one of the involved parties (written notification to the CSSF and the involved party);
- Where the right on which the complaint is based is prescribed and where Deloitte Solutions entity claims that the time period for exercising that has expired;
- Where the complaint has been submitted to a Luxembourg or foreign court or arbitrator;
- Where the complaint has been submitted to an out-of-court complaint resolution body other than the CSSF in Luxembourg or abroad;
- Where the complainant does not provide the additional documents, information, explanations or positions requested by the CSSF within the period set by the CSSF that cannot exceed three weeks².

Commission de Surveillance du Secteur Financier (CSSF)

283, Route d'Arlon
L-1150 Luxembourg

Postal address : L-2991 Luxembourg
Phone number: (+352) 26 25 1 - 2904
Email address: reclamation@cssf.lu

² This deadline remains the responsibility of the CSSF and is indicated here only for information purposes.

Our quality controls

Complaints will be analysed by the Complaints Officer on a quarterly basis for the identification of systemic or recurring problems. If such problems are identified, the firm will consider what actions it may need to take to address these problems.

The complaints handling process will be reviewed periodically, and at least annually, to aim to enhance its delivery of efficient and effective outcomes. This review will be performed by the Complaints Officer or an appropriate appointee. The firm will consider what actions it may need to take to address any deficiencies identified in the review.

Where appropriate, issues that arise as a result of the complaints handling process may be incorporated in the process for monitoring and evaluating partner and employee performance.

Please contact the Complaints Officer if you have any comments or suggestions in respect of the contents of this Policy.



20, Boulevard de Kockelscheuer
L-1821 Luxembourg
Grand Duchy of Luxembourg
Tel.: +352 451 451
www.deloitte.lu in contacts

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte’s approximately 415,000 people worldwide make an impact that matters at www.deloitte.com.

This communication and any attachment to it is for internal distribution among personnel of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms and the unrelated entities (collectively, the “Deloitte organization”). It may contain confidential information and is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, please notify us immediately, do not use this communication in any way and then delete it and all copies of it on your system.

None of DTTL, its member firms, related entities, employees or agents shall be responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.