



Document Control Information

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2.02	03/11/2025	Eric Centi (Conducting Officer, Complaints Officer)	Approval

Document Circulation

This document will be made available on the Firm's website for all relevant stakeholders.

Copies are not controlled.

Review Cycle

This document shall be reviewed at least annually.

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1. Introduction

1.1 Objective and purpose

Deloitte Solutions (hereafter 'DSO' or the 'Company') was incorporated as a 'Société à responsabilité limitée' on 1st June 2016 and is governed by the laws of 10 August 1915 as amended on commercial companies. The Company is authorized and regulated as a professional of the financial sector in Luxembourg ('Professionnel du Secteur Financier' – 'PSF'), under the supervision of the Commission de Surveillance du Secteur Financier ('CSSF').

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

1.2 Regulatory background

This procedure has been written to align with the relevant legal requirements and best practices, including :

- CSSF Regulation N°16-07 relating to out-of-court complaint resolution.
- Circular CSSF 17/671 as amended by Circular CSSF 18/698 on specifications regarding CSSF Regulation N°16-07.
- General Data Protection Regulation (Regulation EU 2016/679)

1.3 Definition

This procedure 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**.

Therefore, requests for information or clarification cannot be considered as complaints.

2. Complaints handling process

2.1 File a complaint

In the event a natural or legal person wishes to file a complaint with DSO, the complaint shall be addressed in writing, either by email or by post, to the Complaints Officer :

Eric Centi
Conducting Officer, Complaints officer
Tel: +352 45145 2162
Email: ecenti@deloitte.lu
Deloitte Solutions
20 Boulevard de Kockelscheuer
L-1821 Luxembourg
Grand Duchy of Luxembourg

When introducing a complaint, please provide the following information:

- Name, position and contact details;
- Relationship with DSO (i.e. the nature of the engagement with DSO,);
- The contact person within DSO;
- The nature of the complaint (including the date of the conduct giving rise to the complaint occurred);
- Details of the DSO employee involved (if applicable);
- Copies of any documentation supporting the complaint.

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If assistance is needed in formulating or lodging a complaint, please to your contact person. If this is not appropriate, please contact the Complaints Officer (contact details as provided above).

2.2 Acknowledgement of complaints

The Company will provide a written acknowledgement of receipt no later than 10 days after receipt of the original complaint, unless the complaint itself has been resolved within this period.

2.3 Recording of complaints

All complaints are logged into the complaints register, recording details of the complaints, including the owner, investigations performed and resolution time.

2.4 Investigation

All complaints are investigated properly, and impartially using all the available information in the best interest of the complainant.

Personally identifiable information concerning the complainant is actively protected from disclosure unless the complainant expressly consents to its disclosure.

2.5 Resolution and response to a complaint

Once the complaint has been investigated, the Company will provide a written response.

DSO endeavours to resolve complaints within four weeks of receiving the complaint, however some complaints may take longer period to investigate and resolve. In such cases, there should be a continuous communication with the complainant at reasonable interval, informing of the reasons for the delay, and indicating when DSO expects to be in a position to complete the review of the complaint.

In case of dissatisfaction with DSO's response, it is possible 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.

2.6 Fees

Introducing a complaint is free of charge.

2.7 Out-of-court resolution complaints

Where the complainant did not receive an answer or satisfactory answer within one month, s/he may refer to the Luxembourg financial regulator (CSSF) within one year of the date the complaint has been filed with DSO.

The request must be filed with the CSSF, in Luxembourgish, German, English or French, using the following means :

- By email to the following address :
Commission de Surveillance du Secteur Financier (CSSF)
283, Route d'Arlon
L-2991 Luxembourg
- Online through the CSSF website, using the complaint form : [Interactive form for complaints – CSSF](#)
- By email to reclamation@cssf.lu

An out-of-court resolution of complaints shall not be submitted 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 to DSO;
- The complainant has not filed a request with the CSSF within one year after s/he filed a request with DSO;
The request handling would seriously impair the efficient functioning of the CSSF.

The request shall be supported by a statement of the reasons on which it is based together with the following documents:

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- a detailed and chronological statement of the facts underlying the complaint and the steps already taken by the applicant;
- a copy of the prior complaint
- a copy of the answer to the prior complaint or the confirmation by the applicant that s/he did not receive an answer one month after s/he sent his/her prior complaint;
- the statement of the applicant that s/he did not refer the matter to a court, an arbitrator or another out-of-court complaint resolution body in Luxembourg or abroad;
- the agreement of the applicant with the request handling conditions of the CSSF as body responsible for the out-of-court resolution of his/her complaint;
- the express authorisation of the applicant so that the CSSF can transmit its request (including the attachments) as well as any future correspondence or information to the professional concerned by the request;
- in the case where a person acts on behalf of an applicant or on behalf of a legal person, a document showing that the person is legally entitled to act so;
- a copy of a valid ID document of the applicant (natural person) or, where the applicant is a legal person, of the natural person representing this legal person.

Where the CSSF has received a request that meets all the conditions, it will transmit a copy thereof to DSO with the request to take position within a period up to one month from the date at which the file was sent. The CSSF will inform the applicant of such transmission.

Within three weeks after receipt of the complete request¹, the CSSF informs both parties:

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

Where the request analysis has been completed, the CSSF will address to the involved parties a conclusion letter, including the statement of reasons for the position taken. Namely either:

- A conclusion letter by the CSSF that the request is partly or totally justified: asking both parties to contact each other to settle their dispute in view of the reasoned conclusion and to inform the CSSF of the follow up; or
- A conclusion letter by the CSSF that the positions of both parties are irreconcilable or unverifiable.

In any case, the conclusion reached by the CSSF is not binding on the parties. Therefore, they are free to accept or refuse to follow them. They may also seek remedies through legal proceedings, in particular, if the parties jointly fail to reach an agreement after the CSSF issued its reasoned conclusion.

The CSSF will request in its reasoned conclusion, that both parties, shall inform the CSSF whether each party decides to accept, to refuse or to follow the solution proposed within the timeframe defined in its reasoned conclusion letter.

2.8 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 DSO claims that the time period for exercising that right 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.

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

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



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

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