

Creator : **Kroll Advisory**
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Compliant Handling Policy

1. Regulatory References

- Articles 313-8, 131-8-1 322-71-1 and 325-12-1 of AMF GR
- Instruction AMF 2012-07

2. Objective

Investment services providers shall establish and maintain operational an effective and transparent procedure for reasonable and prompt handling of complaints received from retail clients or potential retail clients, and from all Alternative Investment Funds (AIF) unit holders or shareholders.

Information on the complaint handling procedure shall be made available to retail clients free of charge.

3. Definition

A complaint is a statement of a dissatisfaction formalized by an investor with a product or service provided by Machina Capital (hereafter “the Firm”). Therefore, requests for information, advice, clarification, service or performance are not considered as complaint.

A complaint has to be submitted by the investor in writing, by mail or email. Handling of complaints is free of charge for all type of clients

4. Complaint Handling

The Firm has implemented and maintains the following operational procedure in order to promptly and efficiently process complaints made by its clients.

After receiving, the Senior Management transmits the complaint to the Chief Compliance Officer and the Manager who analyze the complaint.

The Chief Compliance Officer:

- Ensures as far as possible that the complaint comes from a person who is a customer of the Firm
- Validates or not the reason for the complaint
- Assesses the possible damages for the client / for the Firm •
- Proposes to senior management, a possible response to these complaint and changes to avoid further complaints
- Completes the complaint logbook stored on the network

The “complaint logbook” shall contain:

- The date of complaint
- The complainant's identity
- The reason of the complaint
- The cumulative amount invested to the complaint's date
- The date of the acknowledgement of receipt
- The date of the firm's response
- A summary of the firm's response
- The estimated amount of the damages

5. Delay of Handling

The delay of handling depends on the nature of the complaint.

In every instance the Firm addresses a mail of receipt within a maximum of 10 days from the date of receipt of the complaint.

The Firm will respond to the complaint within a maximum of two months from the date of receipt of the complaint.

Indicated delays start from the date of receipt of the complaint. The complaint is dated from the receipt in order to guarantee the respect of delays.

In the event of your complaint has been rejected either totally or partially by the Firm, a complaint can be brought to the attention of the AMF Ombudsman.

6. Controls

The Chief Compliance Officer ensures that the claims received and processed internally have been transmitted to him and integrated in the "Complaint Logbook".

The internal control framework should allow the Firm:

- To set up an effective mechanism for follow-up of complaints, and
- To identify the causes of malfunctions in order to implement the appropriate corrective actions

At least, once a year, and each semester if necessary, the "complaint logbook" will be monitored by the external auditor to ensure that:

- Responses have been prompt and detailed
- Corrective action was undertaken
- Concerned third parties (custodian, back-office, marketer ...) have been warned, if necessary

7. Mediation

Where a client or investor is dissatisfied with the complaint response they can contact: Médiateur de l'Autorité des Marchés Financiers 17 place de la Bourse, 75082 Paris Cedex 2 <https://www.amf-france.org/fr/le-mediateur/presentation>