

CUSTOMER COMPLAINT PROCESS

The Luxembourg Supervisory Authority, the “*Commission de Surveillance du Secteur Financier*” (“CSSF”) has adopted regulation N° 16-07 (specified by the CSSF circular 17-671 of the October 13th 2017 as modified by the CSSF Circular 18/698) related to the extrajudicial resolution of complaints of clients of financial sector Professionals (this regulation is available on the CSSF web site <https://www.cssf.lu/en/customer-complaints/>). In application, Intesa Sanpaolo Bank Luxembourg S.A. (“the Bank”) informs its clients that any potential complaint will be treated in compliance with the following procedure:

- 1) The claimant (the “Claimant”) can send his complaint by letter or facsimile to the Authorized Member of the Management Responsible for Complaints (M. Cristiano Patalocchi) with a copy to the Compliance Service;
- 2) The Claimant shall indicate his first and last name (and/or that of his legal representative) and his detailed coordinates (address, postal code, city, country, telephone number, mobile number, electronic mail);
- 3) The Claimant explains in detail the facts at the basis of the complaint and the steps already undertaken with his account manager, which were unsuccessful;
- 4) The Bank acknowledges receipt of the complaint within ten days from its receipt and informs the Claimant of the identity and coordinates of the person in charge of the treatment of his complaint as well as those of the person responsible designated at the level of the management;
- 5) The Bank provides the Claimant with its position by registered letter within maximum one month from the date of receipt of the complaint. If, for any reason, the Bank considers that it shall exceed this period, it advises the reason for the delay and indicates the date by which its examination can be finished. For complaints received by facsimile, the Bank can answer to the facsimile number of the Claimant, on express request of the Claimant;
- 6) Should the Claimant consider the response given unsatisfactory, the Bank provides a complete explanation of its position and informs him, in writing, of the existence of the extrajudicial resolution complaint procedure of the CSSF which is free of charge;
- 7) The Claimant can then address a request of extrajudicial complaint resolution to the CSSF, in German, French, English or Luxembourg language, by mail addressed to the CSSF (CSSF Département Juridique 283, route d’Arlon, L-1150 Luxembourg) or by electronic mail (reclamation@cssf.lu), filling in the form available on the CSSF web site (<https://www.cssf.lu/en/customer-complaints/>) together with the documents listed in article 5 (2) of the above mentioned CSSF regulation, within a one year period starting from the date on which his claim was sent to the Bank;
- 8) Within three weeks from the receipt of the request and in case of an unfounded complaint, the CSSF will send in writing to the Claimant and to the Bank a detailed explanation of the reasons for which it does not accept to deal with the dispute;
- 9) In the event the CSSF considers the request of the Claimant founded and complete, it sends a written confirmation to the Bank asking for its position within a reasonable period of time which should not exceed one month;
- 10) The CSSF then provides a motivated decision within 90 days addressed to the Claimant and to the Bank inviting them, in case the request is well-founded, to resolve their differences, in consequence of which the parties shall attempt to reach an amicable agreement and inform the CSSF;
- 11) If the position of the parties is not reconcilable, the Claimant may turn to the Courts or an arbitrator.