

## **CUSTOMER COMPLAINTS**

### **GLOBAL FUNDS TRUST COMPANY MASTER TRUST COMPANY**

March 2025

At Global Funds Trust Company and Master Trust Company (hereinafter referred to as the **"Companies"**), we consider that, as a service organization, client service and satisfaction are of primary importance and we place the interests of our clients first in every action we take. While the Companies make all possible efforts to perform their regulated activities in a manner that ensure clients' satisfaction and thus avoids client complaints, we also recognize that these may occur in the business life of any corporate entity.

To address any complaints you may have, the Companies have a process in place to assist you in resolving your concerns in a professional, open and efficient manner.

#### **Complaint definition**

The Companies define a client complaint as any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a service that relates to trust business or company management business carried on by a regulated Person, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and that there is an explicit or implicit expectation by a client that we will take action to remediate them and or prevent recurrence.

#### **Complaint Management Procedure**

In accordance with its obligations as notably set forth by the Cayman Islands Monetary Authority (hereinafter referred to as **"CIMA"**) Rule and Statement of Guidance on Internal Controls for Regulated Entities effective October 2023, the Rule on Corporate Governance for Regulated Entities effective October 2023, and the Rule and Statement of Guidance on Market Conduct for Trust and Corporate Services Providers and Company Managers effective May 2024, as well as Supervisory Information Circular expectations on Complaints-handling dated 23 October 2024, the Companies have deployed a governance framework surrounding the management of client complaints to ensure that the latter are treated objectively, fairly, in a consistent way and timely manner.

Moreover, the Companies adopted the Customer Complaints Management Policy (hereinafter referred to as the **"Policy"**) developed by their mother Company, Nomura Bank (Luxembourg) S.A., (hereinafter referred to as **"NBL"**) to which they have delegated their Compliance functions. NBL has also established its internal process to make sure that the complaints are handled with utmost attention, that any potential conflicting interests are managed and that the customers' interests are protected at all times.

Any complaint can be raised to the attention of NBL Compliance Department through one of the channels offered in accordance with the following contact details (either by mail or email):

Nomura Bank (Luxembourg) S.A. Attn: Compliance Department Building A 33, rue de Gasperich L-5826 Hesperange Grand Duchy of Luxembourg E-mail: <a href="mailto:Lux-Compliance@lu.nomura.com">Lux-Compliance@lu.nomura.com</a>
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Upon receipt of your complaint, we commit to acknowledge receipt within a maximum of five business days. Our acknowledgment message will indicate the name and direct contact details of the person in charge of managing it.

The resolution of your complaint shall not exceed one month from the date of receipt even if, in certain circumstances notably related to the complexity of the case, a longer period may be necessary and, in such a case, we commit to informing you in writing of the causes of the delay and the date on which the examination is likely to be completed.

In case the complainant does not receive a satisfactory response, the Complainant have the right to address its complaint to a director of the Companies in charge of complaints. The complainant shall, in such a case, send a letter at the above mentioned address and address it to the Director in charge of complaints.

### **Contacting to CIMA**

We would like to bring to your attention that if you have not received an acknowledgement of receipt, an answer or a deemed satisfactory response to your complaint within the delays which are reported herein, you can file a request for complaint resolution with CIMA using the online form accessible from the website link below:

<https://www.cima.ky/complaints>