

Complaints Handling Policy

DXC Technology
Luxembourg S.A.

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1. Introduction

DXC has operated in Luxembourg as a Professional of the Financial Sector (PFS) since July 1, 2007, and in that capacity, is regulated by the CSSF (Commission de Surveillance du Secteur Financier).

The aim of this Policy is to specify the DXC Technology Luxembourg S.A. governance and procedures to be followed for reasonable and prompt **complaints handling and resolution** in compliance with the Luxembourgish regulations and to ensure that when a Complaint occurs, a prompt and reasonable process is invoked to address and investigate the complaint, applying the necessary objectivity, confidentiality and care.

The Policy is applicable to DXC Technology Luxembourg S.A. and all its Employees, Senior Management and the Board of directors and is made available on a shared electronic drive to all Employees. This Policy is approved by the Senior Management and is adopted by the Board.

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2. Purpose of the Complaints Handling Policy

The purpose of the Complaints Handling Policy is to establish an efficient and transparent framework for the handling of client complaints to ensure that complaints are handled fairly and promptly.

DXC employees are made aware of the SpeakUp Line which is communicated in DXC's Code of Conduct and in the annual code training which is mandatory.

3. Scope

This policy has been adapted in the context of the following:

CSSF Regulation 16-07 relating to the out-of-court resolution of complaints (the "CSSF Regulation No 16-07");

A complaint is defined in the CSSF Circular No. 16-07 as "an investor claim filed with a professional to recognise a right or to redress a harm". Requests for information or explanations are not considered as a complaint.

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4. Complaints handling

a) Filing a complaint

Complaints may be submitted by e-mail in English to the Complaints Handling Officer, the CHO of DXC Luxembourg.

- 1- Complaints captured in letters should be sent via local postal services to the following address:

Managing Directors/ Complaints Handling Officer
DXC Luxembourg S.A.
12D, impasse Drosbach
L-1882 Luxembourg

The Complaints Handling Officer (“CHO”) for DXC is Sylvie Grandiere-Lepage to respond to the complaint.

- 2- By email to: complaint-lux@dxc.com

b) Eligibility Assessment

Any Employee who receives a Complaint must assess the eligibility of the Complaint before commencing the Complaints Handling procedure. A Complaint is considered eligible if the following conditions are met:

- The Complaint is related to a service provided by DXC Luxembourg S.A
- The Complaint is specific and is not a general comment or expression of dissatisfaction (i.e., a general query about the experience of the team is not considered a complaints,)

Please note that if a complaint is received about a DXC entity that is not DXC Luxembourg S.A, the complaint should be handed over to the DXC Ethics and Compliance team for further review.

In the situation where the above conditions are met, the Employee must escalate the Complaint to the Managing Directors or the Complaints Handling Officer without delay and provide all documentation related to the Complaint. In case of doubt, the

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Employee should seek advice from the Complaints Handling Officer.

Based on the assessment and nature of the complaint, the Complaint Handling Officer or Managing Directors may seek the advice of Human Resources or Legal counsel (within DXC or Externally).

Client complaints will be communicated by the ADL (account delivery lead) to the Managing Directors and the Complaints Handling Officer.

Employees of DXC as part of the annual code of conduct can also use the SpeakUp platform to report any misconduct.

c) Addressing the complaint

Unless the complexity of the complaint does not allow it, of the complaint is received anonymously, DXC Luxembourg aims to notify the Complainant of its findings and any actions taken in regard to the Complaint. The notification will be issued by the Complaints Handling Officer or Managing Directors within **30 business days**.

1. Acknowledgement – 10 business days

An initial and formal acknowledgement of the complaint will be issued to the complainant within 10 business days.

If a complete response to the complaint cannot be provided within those **10 business days**, the formal response to the Complainant will include the following items::

- The expected timeframe for resolving the Complaint;
- The causes of the delay;
- The name and the contact details of a contact person for the Complainant to communicate with.

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2. Investigation of the Complaint

The Complaints Handling Officer or Managing Directors will ensure an objective investigation of the Complaint is performed that includes but is not limited to collecting supporting documentation from the complainant and the affected business units, an assessment of financial, legal, operational and reputational impacts, a determination - to the extent possible – of root causes, the existence of recurring patterns, and the determination of action plans to address (and prevent recurrence of) any identified issues and their associated risks.

3. Answer to the Complainant – 30 business days

DXC Luxembourg is committed to swiftly investigate and address any complaints received without undue delay, and aims to provide the Complainant a detailed response to their complaint within 30 calendar days from the date of receipt. If a response cannot be provided within this timeline, a follow-up letter must be sent to the Complainant explaining the reason for the delay and giving indication as to when the investigation is likely to be concluded.

Any response letter issued to the Complainant will be in plain and easily comprehensible language. Once the Complainant has received DXC Luxembourg's final response, the Complainant has 15 business days to formulate a follow-up response should they believe the complaint has not been addressed adequately. If no further correspondence is received within this timeline, the Complaint will be considered closed.

4. Out-Of-Court Resolution

If the Complainant is not satisfied with the response provided, the Complaints Handling Officer or Managing Directors inform the Complainant of the out-of-court resolution procedure at the CSSF, highlighting that an out-of-court resolution request must be filed with the CSSF within one year after the initial Complaint was filed.

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Where DXC Luxembourg S.A is the initiator of the out-of-court complaint resolution procedure with the CSSF, the Complaints Handling Officer will send the following information to the Complainant:

- 1- a copy of the CSSF Regulation 16-07

[Circular CSSF 17/671 \(as amended by Circular CSSF 18/698\) – CSSF](#)

- 2- The different means to contact the CSSF to file a request and a reference to the CSSF website (<https://reclamations.apps.cssf.lu/index.html?language=en>)

5. Record Keeping

The Complaints Handling Officer maintains a log of Complaints that were received, including all supporting documentation that was included in the complaints submission, The log will allow any individual to trace back any relevant contact, internal investigation and resolution measures.

The log must contain:

- Date of the Complaint
- Name and contact details of the Complaint
- Details and reason of the of the Complaint, including any specific amount claimed (if any)
- Contact details of relevant Business Unit
- Detail on the internal investigation
- Status of the complaint (open, pending, closed)
- Any correspondence (e.g., Complaint, response etc.)
- Date of the answer to the Complainant
- Resolution measures
- If the complaint is due to an incident
- The outcome of the handling process (the answer to the Complainant: positive or negative answer to the request of the Complainant)

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- A confirmation whether the Complainant was satisfied or not with the response that was provided
- If Board involvement was required

Information regarding the Complaints must be treated as confidential, both externally and internally. Consequently, the register may only be accessible to Employees who need the information for the performance of their duties.

6. Reporting

6.1 INTERNAL REPORTING

The Complaints Handling Officer informs Senior Management of any Complaints received in order to ensure that any potential recurring system issues and related risks are identified and properly addressed or mitigated.

On a quarterly basis, the Complaints Handling Officer, as part of the compliance reporting, reports a summary of the complaints received to the Board. As part of the governance policy bimestrial (two monthly) a complaint register review meeting is planned to review the complaint register and complaint policy, this meeting is minuted and stored on the local Sharepoint.

6.2 REGULATORY REPORTING

In accordance with regulatory requirements, a Complaints summary is provided by the Complaints Handling Officer responsible for Complaints handling to the CSSF on an annual basis, with a table including the by Complaints (see Appendix 1). The report covers all Complaints received and reviewed/investigated during the previous calendar year. A summary report will also be provided listing the Complaints as well as the measures taken, the reasons for the Complaints, and the progress made in their investigation. Both documents are

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submitted to the CSSF within 5 months following the end of the financial year of DXC Technology Luxembourg S.A.

Detailed information of closed Complaints shall be retained for a period of 5 years.

In the case where there are no Complaints received and recorded, a nil report is reported to the CSSF by the managing directors.

7. Duties & Responsibilities

7.1 COMPLAINTS HANDLING OFFICER (CHO)

The Complaints Handling Officer responsible for compliance and complaints handling, has the appropriate professional experience and the required profile.

The Complaints Handling Officer is responsible for:

- Handling, centralizing and following-up of the Complaints
- Conducting an independent analysis on Complaints, using a risk-based approach to identify and address any risk and issue related to the procedures and the controls implemented by the Business Function.
- Investigating Complaints in sufficient detail, to be able to provide a meaningful response to the issues raised in the Complaint.
- Analyzing the data relating to complaints handling on a permanent basis, to enable the identification and treatment of any recurring or systematic problem, as well as any potential legal and operational risks.
- Providing advice to the Business Function that initially received the Complaint
- Reporting to Senior Management and the Board on the Complaints, at least on a quarterly basis

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- Reporting to the CSSF on an annual basis (within 5 months following the end of the financial year) on the Complaints and any corrective actions taken

Where considered appropriate, the CHO may request assistance from various groups and/or individuals to assist in the review, analysis and investigation of any complaint, to ensure adequate experience and knowledge, without compromising independence.

7.2 EMPLOYEES

As highlighted in section 4d, Within their respective Business Function, Employees assess the eligibility of the Complaints in accordance with the regulation and escalate the eligible Complaint to the Complaints Handling Officer. In case of doubt, the Employees should escalate or seek advice from the Complaints Handling Officer. The Employees must collaborate with the Complaints Handling Officer and provide all the documentation / information necessary for the investigation.

8. Conflict of interest

As part of the Complaints handling process, DXC Luxembourg ensures that the Board, Senior Management, the Complaints Handling Officer and any other individual or group involved in any complaints, all comply with the DXC Technology Luxembourg S.A. Conflict of Interest Policy.

9. Documentation and Review

This Policy and every adopted version thereof will be archived electronically for five years.

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The Complaints Handling Officer updates the Policy at least annually and as soon as possible where necessary to consider changes in the legal and regulatory environment applicable to DXC Technology Luxembourg S.A. activities. All changes shall be approved by the Board as well as communicated to all Employees.



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APPENDIX 1 CSSF COMPLAINTS REPORTING TEMPLATE

Type of Complaint	Summary report on Complaint	Reason for Complaint	Measures taken	Opening date	Closing date

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