

# Hamilton Lane (Germany) GmbH

## Complaint Handling Policy

### Scope

This policy is applicable for investors into all financial services products managed by the Hamilton Lane (Germany) GmbH ("Firm"). This policy is made available to all relevant employees through publication on the Intranet site and through inclusion in the procedures manual of the Firm.

### Definition

The Firm applies the following definitions of a complaint and a complainant:

- A Complaint is a statement of dissatisfaction addressed to the Firm by a natural or legal person relating to the provision of an investment service provided under the applicable European regulations, as amended from time to time.
- A complainant is any natural or legal person having filed a complaint.

### Handling of Complaints

- I. Making a complaint shall, as far as reasonably possible, be made free of charge for the complainant.
- II. All complaints received shall be treated fairly and diligently.
- III. The Firm shall handle complaints in a professional, correct and prompt manner and in accordance with internal guidelines and rules.
- IV. The Firm shall, upon receipt of a complaint, acknowledge receipt of such received complaint and inform the complainant of receipt of the complaint and the name of the person handling the complaint including contact details to such person.
- V. Complaints shall be responded to in a plain and easily comprehensible language. Regardless of the language of the complaint being filed, the Firm shall respond in either English or German, whichever is deemed more suitable for the complainant.
- VI. The Firm aims for responding to each received complaint as soon as possible after receipt and shall provide an answer without undue delay in any case.

### Complaints Management Function

To ensure a consistent and oriented approach in handling complaints, the Firm has appointed a Complaint Manager. This person shall be responsible for the handling, documentation and follow up on all complaints reaching the Firm.

The complaints management function is performed by the Firm's Compliance Officer.

### Identification and Registration of Complaint

Identification: The Complaint Manager takes note of and identifies each potential complaint which is sent directly to the Firm.

Registration: The Complaint Manager ensures that a register be kept of all received complaints. The register shall contain the date of receipt, mail exchange with the complainant, actions taken, preventive measures, and any applicable resolution or escalation.

Resolution: As a basic principle, the Complaint Manager shall liaise with the relevant department within the Firm to resolve the complaint. In each case, the Complaint Manager shall be the main point of contact and shall provide reasonable assistance to ensure that all complaints are handled effectively.

Internal Information: The Complaint Manager reports each complaint to Senior Management for information.

Notices: The Complaint Manager will seek to acknowledge receipt of the complaint within ten (10) business days unless the answer itself is provided to the complainant within this period. The Firm shall provide an answer within a month from the receipt. Where an answer cannot be provided within one month, the Complaint Manager shall inform the complainant of the causes of the delay and indicate the date at which the examination is likely to be achieved. Any notices to the complainant shall be given on paper or by way of a durable medium and shall be clear and comprehensible.

#### Escalation of Complaints

If the complainant is not satisfied with the solution proposal received from the Complaint Manager, the complainant will be invited to raise the complaint up to the level of the Senior Management of the Firm (the name and the relevant contact details of the person responsible at that level will be provided with the response provided by the Complaint Manager).

If the final solution proposal provided by the Senior Management fails to meet the complainant's expectations, the Firm will provide the complainant with a full explanation of its position as regards to the complaint.

If the complaint is aimed at recognising a right or redressing a harm, it will inform the complainant of the fact that, in order to seek to obtain an out-of-court resolution of the relevant issue giving rise to the complaint, a request may be filed with the Federal Financial Supervisory Authority ("BaFin"), and that such request needs to be filed within one year from the date at which the complaint has been filed with the Firm.

If the Firm has decided to have recourse to the out-of-court resolution, it will simultaneously inform the complainant of this decision.

#### Reporting of Complaints to the Authorities

The Complaint Manager provides reports of complaints to BaFin in electronic form via the MVP Portal once annually by 1<sup>st</sup> March of the previous calendar year.

#### Approval and Review of the Policy

This policy is defined and endorsed by the Senior Management of the Firm. The following principles apply for the maintenance of the policy:

Review: This policy will be reviewed and updated at least each year or ad-hoc when needed due to new regulations being published or other changes to the work processes.

Approval: A new and updated policy shall always be given to the Board of Directors of the Firm for approval.

Publication: The latest version of the approved policy shall be made available on the website of the Firm.

### How to file a Complaint

To allow for an immediate response, a complaint should contain all relevant information concerning the cause of dissatisfaction.

A filing may be done using one of the mediums listed below:

Telephone: +49 69 153 259 299

Email: [compliance@hamiltonlane.com](mailto:compliance@hamiltonlane.com)

Letter: **FAO: Hamilton Lane (Germany) GmbH Complaint Manager**  
Schillerstr. 12, 60313 Frankfurt am Main, Germany

### Document Reviewer History

Date Reviewed	Reviewer
2021	Frederick Shaw
05/31/2023	Christian D'Amico
2025	Zoe Gomez