



# **NEWALPHA ASSET MANAGEMENT**

**Policy for handling customer enquiries or  
complaints**

**August 2022**

## Foreword

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**First of all, contact your usual advisor.**

We remind you that for any request for information or complaint, you must first contact your advisor who remains your main contact for the product in question.

**You may also contact us at a later stage. To do so, follow the policy described below.**

## Contents

<i>I. Who can contact us?</i> .....	4
<i>II. Contact us</i> .....	5
<i>III. Response times</i> .....	6
<i>IV. Handling of complaints</i> .....	6
<i>V. Data protection</i> .....	9
<i>Appendix: Accreditations of companies in the La Française Group</i> .....	10

## I. Who can contact us?

Holders of financial instruments managed or designed by the La Française Group may contact us for any question or complaint relating to these products (performance, net asset value, regulatory documents, etc.).

Customers to whom La Française Group companies provide an investment service (investment advice, order reception/transmission, etc.) may also contact them for any questions/complaints relating to the investment service provided.

For any question relating to a service or a financial instrument issued by the La Française Group, you may contact us as detailed below.

- **by phone or fax at the following number:**

La Française<sup>1</sup> – Customer & Partner Services

Phone number: +331.53.62.40.60

Fax number: +331.44.56.11.03

LFFS Luxembourg Branch (for funds governed by Luxembourg law) – Customer Services

Phone number: +352 248 322 001

- **by post to the following address :**

La Française<sup>1</sup> – Customer & Partner Services

Address: 128 boulevard Raspail 75006 Paris - FRANCE

LFFS Luxembourg Branch (for funds governed by Luxembourg law) – Customer Services

Address: 60, Grand-Rue – BP-1556 L-1660 Luxembourg

With regard to complaints, a special handling system has been set up and is detailed below in section IV.

Your enquiries/complaints are dealt with free of charge.

<sup>1</sup> The Customer & Partner Services Department is responsible for handling any questions/complaints relating to companies in the La Française Group, with the exception of LFAM Private Banking division for management under mandate, and LFFS Luxembourg Branch for funds governed by Luxembourg law (see list of Group companies in the Appendix).

## II. Contact us

Your contact options differ depending on the company concerned, and the financial instruments or services issued:

- La Française: if your complaint relates to a financial instrument from the La Française Group (LFAM, LFREM, SIPAREX, New Alpha) or to a service provided by LF AM FS, MONIWAN.
- LFFS Luxembourg Branch: if your complaint relates to a Luxembourg UCI or to a service provided by LFFS Luxembourg Branch.



**LA FRANÇAISE**

Email contact	reclamations.clients@la-francaise.com
Contact by post	La Française – Customer & Partner Services 128 boulevard Raspail 75006 Paris



Luxembourg Branch  
60 Grand-Rue BP-1556 – L-1015 Luxembourg  
Tél. : +352 24 83 221  
Fax : +352 248 322 242

Email contact	LFComplianceOfficer@la-francaise.com
Contact by post	LFFS Luxembourg Branch – Customer services 60 Grand-Rue – BP-1556 L-1666 Luxembourg

In the subject line of your letter/email, it is important to indicate the nature of your request using the following terminology:

- The company concerned (in this case New Alpha Asset Management)
- The service or product concerned
- Request for regulatory documents
- Information request/explanation/clarification
- Complaint (dissatisfaction) about a financial instrument or a service provided
- Other requests

Please note that customers are welcome to call us for any information enquiry. However, in the event that you are dissatisfied with any aspect of our services, complaints are not accepted by the La Française Group over the phone. In this case, we will require a written record of the reasons for your dissatisfaction (by post or email), in order to fully understand the subject of your complaint and to provide you with a better service.

### **III. Response times**

If you contact us by email: you will receive confirmation that your request has been received.

If you contact us by any other means, your request will not be acknowledged unless it concerns a complaint received by post: in this case, an acknowledgement of receipt will be sent to you within a maximum of 10 days, unless the reply to your complaint has already been sent to you.

- Your enquiry concerns a complaint.  
Maximum period of time: 2 months

You will be kept informed of the progress of your complaint, in particular if circumstances dictate that the LF Group is unable to respect the maximum response period of 2 months.

This response period runs from the date of receipt of the enquiry by the La Française Group. A system of time stamps on the application makes it possible to monitor compliance with these response times.

### **IV. Handling of complaints**

#### **What is a complaint?**

A complaint is a statement of the customer's dissatisfaction with the professional service provided. A request for information, advice, clarification, service or benefit is not a complaint.

Please note: customers are welcome to call us for any information enquiry. However, in the event that you are dissatisfied with any aspect of our services, complaints are not accepted by the La Française Group over the phone. In this case, we will require a written record of the reasons for your dissatisfaction (by post or email), in order to fully understand the subject of your complaint and to provide you with a better service.

#### **Processing complaints**

Your complaint is handled by the Customer Relations Department.

The Compliance Department of the La Française Group may monitor the response to your complaint in order to ensure, in accordance with the regulations, you receive an adequate response in accordance with your interests.

## **What to do if you are not satisfied with the response to your complaint from the La Française Group.**

If, after communicating with the La Française Group, you are not satisfied with the response to your complaint, you can contact either of the following, free of charge:

- The Mediator for Crédit Mutuel Mediator, or
- The Mediator for the AMF, the public ombudsman for all complaints relating to financial instruments.

Please note that your choice is final in making such a complaint. The La Française Group has chosen its own mediator, namely the Crédit Mutuel mediator, which is a company mediator.

You can contact the Crédit Mutuel Mediator:

- By post

Le Médiateur du Crédit Mutuel  
63, chemin Antoine Pardon  
69160 Tassin La Demi-Lune  
FRANCE

- By using the form available on the website to submit your case online:  
[www.lemediateur-creditmutuel.com](http://www.lemediateur-creditmutuel.com)

You will find below more information about the mediation service:

### **Who is the Crédit Mutuel Mediator?**

The Crédit Mutuel Mediator is an independent and impartial person who has been chosen for their skills and experience.

### **Mediation process**

If your referral is admissible and upon receipt of the documents on which your enquiry is based, the Mediator informs you – either by email or by post – of the opening of the mediation procedure and its starting date, reminding you that the parties may withdraw from the process at any time.

The Mediator shall, at the request of one of the parties, transmit all or part of the documents in the case. The Mediator is free to receive the parties together or separately.

In the event of any circumstances liable to affect their independence or impartiality or liable to create a conflict of interest, the Mediator will immediately inform the parties of their right to object to the continuation of his assignment. If one of the parties consequently refuses to continue the mediation, the Mediator's assignment shall be terminated.

The mediator will no longer be able to receive any instructions from the parties.

### **What is the Mediator's response time?**

You will receive the Mediator's proposal by post within no more than 3 months following receipt of your enquiry. This period may be extended in the event of a complex dispute.

For more information about the Crédit Mutuel Mediation, please read the Mediation Charter: [https://www.la-francaise.com/fileadmin/docs/Publications/EN/Mediation\\_Charter\\_of\\_Credit\\_Mutuel.pdf](https://www.la-francaise.com/fileadmin/docs/Publications/EN/Mediation_Charter_of_Credit_Mutuel.pdf)

or go to the Mediator's website (<https://www.lemediateur-creditmutuel.com/>)

You may also contact the Mediator of the Autorité des Marchés Financiers (AMF) under the following conditions:

- In writing:  
Autorité des marchés financiers (AMF)  
La médiation  
17, place de la Bourse  
75082 PARIS CEDEX 02
- By electronic form (link below)  
<https://www.amf-france.org/en/amf-ombudsman/mediation-file/request-mediation>

The AMF Mediator intervenes in the event of any complaint that falls within their field of competence:

- marketing of financial products,
- portfolio management,
- transmission and reception of stock market orders
- holding of a securities account or PEA, etc.

### **How is the mediation procedure carried out?**

The mediation procedure is free of charge. Each party submits their observations and an analysis of the dispute to the Mediation officer, producing, if necessary, a legible copy of the supporting documents in their possession (account opening agreement, management mandate, subscription form, transaction notices, periodic statements, management reports, exchange of letters, screenshots, etc). The procedure is adversarial and conducted in writing. The Mediator may also summon the parties to a meeting. In all cases, the Mediator will seek an amicable solution acceptable to both parties. The parties will then indicate whether or not they agree with this solution. If they do, the Mediator will ensure the effective implementation of the solution. The parties can modify this solution or decide to halt the proceedings at any time.

## **V. Data protection**

In application of amended law no. 78-17 of 6 January 1978 relating to information technology, files and freedoms, it is specified that the personal data collected is mandatory for the processing of customer requests/complaints, and that as such, it will be processed by the La Française Group.

This data may be used for the purposes of processing the customer's enquiry/complaint. It may also be communicated to third parties where this is necessary to process the customer's enquiry/complaint.

The persons to whom the data relates have the right to obtain information from the La Française Group, 128 boulevard Raspail 75006 PARIS, to demand, if necessary, that it be rectified and to object to it being used for commercial prospecting purposes.

### **Appendix: Accreditations of companies in the La Française Group**

The Customer & Partner Service of La Française is competent for all questions/complaints relating to New Alpha Asset Management

New Alpha Asset Management, a management company, approved by the AMF under the number GP05000001 on 20 January 2005.

The approval of the companies can be consulted on the following websites:

- [www.amf-france.org](http://www.amf-france.org)
- [www.acpr.banque-france.fr](http://www.acpr.banque-france.fr)
- [www.orias.fr](http://www.orias.fr)



**NEWALPHA ASSET MANAGEMENT**

128 boulevard Raspail

75006 Paris, France

Tel : +331 4456 1000

Fax : +331 4456 1100

Email : [info@newalpha.com](mailto:info@newalpha.com)