



Advent International Fund Manager S.à r.l.

Complaints Handling Overview

April 2024

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1. Glossary

Term	Description
AIF	Alternative investment fund, within the meaning of the AIFM Law, managed by the AIFM
AIFM	Advent International Fund Manager S.à r.l., a limited liability company, qualifying and authorized by the CSSF as an alternative investment fund manager under the AIFM Law
Board	Board of managers of the AIFM
Conflict(s) of Interest	Situation where different parties have interests that might conflict with each other. Such conflicts may arise where between different functions and/or units of the AIFM but also between different functions, units and/or companies of the Advent Group it belongs to (including Advent Group employees and tied agents, or any person directly or indirectly linked to them by control) and the AIFM, as well as between one AIF or Investor and another AIF or Investor
CSSF	<i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg financial supervisory authority of the financial sector
Investor(s)	Individual unit/shareholder or group of unit/shareholders in AIFs managed by the AIFM

2. Complaints Handling

The following information is made available to (potential) Investors:

Advent International Fund Manager S.à r.l. has adopted a Complaints Handling Policy, which provides a common, clear and precise understanding of the way in which the AIFM handles clients' complaints, including a clear definition of the roles and responsibilities of the different stakeholders.

The compliance officer of the AIFM, including the Cyprus Branch and the Athens Branch, Mr. Holger Emmel (the "**Compliance Officer**"), is the person responsible for handling complaints received from AIFs or Investors. He will have unlimited access to all relevant data which could potentially help him to resolve the issue.

All complaints received will be investigated promptly by the Compliance Officer with the full cooperation of the concerned department or function of the AIFM. However, to avoid any conflict of interest, any requested logistical support shall be provided by employees who are not related to or involved in the matter giving rise to the complaint and in case the subject of the complaint is the Compliance Officer, one of the members of the board of managers of the AIFM (the "**Board**") will take over the complaint handling process.

1. Complaints

Complainants who wish to file a complaint may do so in English, by addressing the AIFM or the Branch directly. The relevant contact details are as follows:

Complaint Handling Officer of the AIFM:

Advent International Fund Manager S.à r.l.
Attention of: Compliance Officer (Mr. Holger Emmel)
Address: 2-4 Rue Beck L-1222 Luxembourg
Tel Number: +352 281344203
E-mail: Complaints@adventinternationalfm.lu

Complaint Handling Officer of the Cyprus Branch of the AIFM:

Advent International Fund Manager S.à r.l., Cyprus Branch
Attention of: Compliance Officer (Mr. Holger Emmel)
Address: 2-4 Rue Beck L-1222 Luxembourg
Tel Number: +352 281344203
E-mail: Complaints@adventinternationalfm.lu

Complaint Handling Officer of the Athens Branch of the AIFM:

Advent International Fund Manager S.à r.l., Cyprus Branch
Attention of: Compliance Officer (Mr. Holger Emmel)
Address: 2-4 Rue Beck L-1222 Luxembourg
Tel Number: +352 281344203
E-mail: Complaints@adventinternationalfm.lu

A complaint should include the following information:

- full name and contact details of the complainant;
- a detailed explanation of the facts (issue or transaction) at the origin of the complaint; and
- a copy of all related supporting documents.

2. Complaints handling procedure

The AIFM will handle complaints as follows:

- The AIFM will deal with the complaint within 48 hours or, if not feasible, an acknowledgement letter will be sent to the complainant (within 10 business days) as of the receipt of the complaint, if the complaint cannot be closed before this time. This acknowledgement will inform the complainant that the matter is under investigation, the time the investigation will take, and of the name and contact details of the person in charge of its file;
- The AIFM will seek to conduct a thorough investigation and analysis of the relevant facts and circumstances in order to resolve the matter;
- The AIFM will have unlimited access to all relevant data which could potentially help resolve the issue;
- The AIFM will provide an answer without undue delay and in any case, within a period which cannot exceed one month between the date of receipt of the complaint and the date at which the answer to the complainant was sent;
- Where an answer cannot be provided within this period, the AIFM will inform the Investor of the causes of the delay and indicate the date on which a response should be available; and
- The AIFM will send a final recommendation to inform the complainant on the outcome of its investigation and the actions taken to resolve the complaint. In any case, the AIFM will provide the complainant with a detailed explanation;
- The AIFM could grant compensatory measures to remedy the issue giving rise to the complaint in a fairly and proportionate to the nature and seriousness of the complaint, subject to the approval of the Board; and
- Where the outcome of the investigation is insufficient to resolve the complaint, the AIFM may decide to use the services of external third parties (i.e. lawyers, auditors).

The AIFM will seek to communicate in a plain and easily comprehensible language. All responses will be communicated in writing.

The AIFM does not charge complainants any fees in relation to complaints.

3. Escalation process

Complainants are hereby informed as follows:

3.1 Board

- Where the complainant did not receive an answer or any satisfactory answer, he/she/it may raise the complaint to the Board, and
- The name and contact details of the relevant Board member will be provided to the complainant by the person in charge of the file.

3.2 CSSF and/or court of competent jurisdiction

Where the AIFM is not able to provide a satisfactory solution to the complainant, the complainant may escalate the issue to the CSSF or a court of competent jurisdiction.

The request must be introduced with the CSSF within a year at the latest after the date on which the complainant has introduced in writing his/her complaint (on the same subject) with the Compliance Officer.

4. Record keeping

All complaints received by the AIFM (whether written or oral) as well as the measures taken to handle them are properly registered in a complaints register, including at least the information provided for in item 362 of CSSF Circular 18/698.