

Allspring Global Investments Luxembourg S.A.

Complaints Handling Procedure

Purpose / Background / Scope

Allspring Global Investments Luxembourg S.A. is authorized to:

- (i) act as a management company pursuant to chapter 15 of the Law of 17 December 2010 relating to UCITS, as may be amended from time to time (“Law of 2010”) transposing the Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities, as may be amended from time to time (“UCITS Directive”);
- (ii) act as an alternative investment fund manager pursuant to chapter 2 of the Law of 12 July 2013 on alternative investment fund managers (the “Law of 2013”);
- (iii) provide discretionary portfolio management and investment advice services pursuant to Article 101(3) of the Law of 2010, and discretionary portfolio management, investment advice and reception and transmission of order services pursuant to Article 5(4) of the Law of 2013.

Allspring Global Investments Luxembourg S.A., in its quality of management company, is required to establish and ensure compliance with a written procedure for the effective consideration and proper handling of complaints.

The purpose of this Procedure is to establish the framework and responsibilities for understanding the concerns that clients may have in relation to investment in the Funds managed by Allspring Global Investments Luxembourg S.A., segregated accounts or any related services or practices, and to resolve them in a way that both strengthens the Allspring Global Investments Luxembourg S.A.’s relationship with their clients and improves Allspring Global Investments Luxembourg S.A.’s business practices.

This procedure sets out the formal requirements when receiving complaints from clients of Allspring Global Investments Luxembourg S.A. This Procedure is applicable to all team members of Allspring Global Investments Luxembourg S.A. and to the branches of Allspring Global Investments Luxembourg S.A.

Process, Procedure and Controls Description

1. Definitions

Allspring Global Investments Luxembourg S.A. clients

Clients of Allspring Global Investments Luxembourg S.A. are all Funds (including investors), distributors and segregated accounts managed by Allspring Global Investments Luxembourg S.A. (“clients”), irrespective of the legal form and the



status of the client within distribution chain. This includes retail and institutional investors, natural and legal persons, appointed sub distributors and intermediaries. To ensure that Allspring Global Investments Luxembourg S.A. is aware of all complaints, and that such complaints are responded to in an efficient, transparent and timely manner, the procedure included in this document must be followed. Allspring Global Investments Luxembourg S.A. is committed to take every concern of a complainant seriously. This procedure shall reflect the concern for objectivity and search for truth. It shall also enable the identification and mitigation of possible conflicts of interest.

Complaint

In general, a complaint occurs whenever a client raises a concern, a grievance or dissatisfaction about the execution of Allspring Global Investments Luxembourg S.A.'s activities.

In particular, a complaint may include, but is not limited to any assertion by a client of:

- Improper conduct of Allspring Global Investments Luxembourg S.A.
- Breach of rule or regulation by Allspring Global Investments Luxembourg S.A.
- Operational failures
- Investment performance of Allspring Global Investments Luxembourg S.A.

A complaint may also include a demand, express or implied, for a financial compensation or adjustment.

2. Procedure

Submission

Any client wishing to communicate a complaint relating to Allspring Global Investments Luxembourg S.A. must do so in writing providing full details about the complaint together with the complainants name and address and the applicable sub-fund(s), if any. Complaints can be submitted free of charge.

Any client may file a complaint in any of the official languages of their Member State.

The letter of complaint should be sent to the address as stated below:

Allspring Global Investments Luxembourg S.A.

Building H20 – 2nd floor | 33, rue de Gasperich | L-5826, Luxembourg

or

E-mail: allspringluxembourg@allspringglobal.com



Roles and Responsibilities

The Executive Committee of Allspring Global Investments Luxembourg S.A. is responsible for the implementation of the complaints handling procedure as outlined in CSSF regulation 16-07. The Executive Committee has appointed Sascha Wadle as Conducting Officer responsible for the complaints processing as well as the efficient operation of the complaint handling processing (the “Conducting Officer”). The Conducting Officer shall always be in a position to know the status of the individual complaint processing and control the complaints processing accordingly. Vis-à-vis the CSSF, the Conducting Officer is the ultimate responsible person. The Conducting Officer also ensures that the compliance with this procedure is checked by the Compliance Officer and Internal Audit of Allspring Global Investments Luxembourg S.A. on a regular basis.

It is the responsibility of the Conducting Officer, the individual receiving the complaint, his/her manager and the Compliance Officer of Allspring Global Investments Luxembourg S.A. to investigate and resolve client complaints.

Response and resolution

No complaint as defined in this procedure shall remain unanswered. Complaints will be handled in a careful and prompt manner. The person responsible for handling of the complaint will strive to contact the client within 48 hours to acknowledge the issue and provide a follow-up plan. The acknowledgment shall include the name and contact details of the person in charge of the complaint and details as relevant of any other persons for escalation purposes. Generally, if a client complaint has not been resolved after five business days, the person responsible for handling of the complaint is responsible for providing a status update, in writing, to the client.

The targeted resolution time for complaints is 10 business days from the day the complaint is first received. Due to the complexities of issues raised, certain types of complaints will routinely require a longer research and resolution period. The responsible person to whom the complaint has been addressed is responsible to review and evaluate their complaint management processes to endeavour quicker turnaround in accordance with common business practices, when appropriate, to improve responsiveness to the client. The person responsible for the handling of the complaint will seek to gather and investigate all evidence and information in regard to each complaint in a manner demonstrating concern for objectivity and truth, and he/she will seek to communicate in a plain and easy to comprehend language

Escalation

- A. If a complaint raises a conflict of interest for the person handling the complaint (for example, the complaint is made against that person), then the complaint should be immediately forwarded to the Compliance Officer and the Conducting Officer, who will decide on the opportunity to escalate the complaint to the board of directors.
- B. In the event where the complainant does not obtain an answer or a satisfactory answer, the complainant should have the opportunity to raise the complaint up to the Compliance Officer and/or the Conducting Officer. Every answer to a complaint must contain the opportunity to raise the complaint to the Conducting Officer. In this respect, every answer to a complaint shall also provide the contact details of the Compliance Officer and Conducting Officer. During the whole complaints process the complainant shall only have one contact person if possible.
- C. If, after one month as from the dispatch of the complaint to Allspring Global Investments Luxembourg S.A., the complainant has not received a satisfactory answer, he/she may file his/her request with the CSSF within one year from the filing of the complaint with Allspring Global Investments Luxembourg S.A. The intervention of the CSSF is subject, amongst others, to the conditions that the complaint was first dealt with by Allspring Global



Investments Luxembourg S.A. and that everything was done in order to find an appropriate solution to the problem.

Complaints may be forwarded to the CSSF utilizing the form at the following link:

<https://reclamations.apps.cssf.lu/index.html?language=en>

Clients may also contact the CSSF either by post addressed to:

Commission de Surveillance du Secteur Financier, Département Juridique CC

283, Route d'Arlon,

L-2991 Luxembourg, or

by email at the following address: reclamation@cssf.lu

The mission of the CSSF consists of assisting the parties concerned in order to settle amicably the conflict opposing them. Note however, the CSSF's opinion is not binding.

Governance and Reporting

The transfer agent of the Funds provide periodic reports to Allspring Global Investments Luxembourg S.A. with information on complaints received. Reports will be prepared and sent to the board of directors of the Funds and/or Allspring Global Investments Luxembourg S.A. no later than the next regularly scheduled board meeting. Complaints related to a regulatory inquiry, pending litigation, of a serious nature or addressed directly to the board of directors will be proactively communicated to the Funds' board of directors at or prior to scheduled board meetings.

The Procedure is reviewed at least annually, or if material changes are necessary. Allspring Compliance will provide reporting related to the complaints as appropriate, to the Allspring Luxembourg Executive Committee and Luxembourg Boards of Directors.

Allspring Global Investments Luxembourg S.A. shall communicate to the CSSF an annual report indicating the number of complaints filed by investors, the reason for such complaints, and the progress made in handling them.

Review

A regular review of customer complaints, and their root causes, is established in order to detect any recurring or systemic deficiency.

Exceptions

Exceptions are not allowed for this procedure.

Violations

Any actual or suspected violations of this Policy must be reported to the Policy owner. The Policy owner is responsible for investigating any actual or suspected violation of the Policy. All Policy violations must be escalated and communicated promptly to the Conduct and Ethics Team at Conduct@allspringglobal.com.



Violation examples include but not limited to:

- Failing to file a complaint as defined under this policy.
- Willful blindness or negligence in reporting a complaint or misconduct.

Please, refer to the Conduct and Ethics page on Springboard for “Conduct Matters Guidance.”

Recordkeeping

The Compliance Officer of Allspring Global Investments Luxembourg S.A. maintains a record of the complaints and respective documentation, which includes all correspondence received in relation to the complaints, any correspondence sent in response to the complaints (including the final response), and any material relating to the investigation of the complaints.

The Compliance Officer of Allspring Global Investments Luxembourg S.A. also maintains a centralized log of complaints received for a period of five years from the date of resolution or otherwise closed.

Disclosure of this complaint procedure

This procedure is available upon request and is free of charge. It may also be requested by contacting Allspring Global Investments Luxembourg S.A. either via mail or email.

Related policies

Consult related policies below and/or engage with Compliance/Policy Owners if you have additional questions. Please, refer to the Allspring Policy Library page on Springboard to access all related policies:

- Code of Ethics
- Conflicts of Interest

Contact Information

Please contact Allspring Global Investments Luxembourg S.A. for any questions about this procedure:

Allspring Global Investments Luxembourg S.A.

Building H20 – 2nd floor | 33, rue de Gasperich | L-5826 Hesperange, Luxembourg

allspringluxembourg@allspringglobal.com