

About Partners Group (Luxembourg) S.A.

Partners Group (Luxembourg) S.A. ('Partners Group Luxembourg'), which is authorised and regulated by the Commission de Surveillance du Secteur Financier ('CSSF'), is a Luxembourg subsidiary of Partners Group Holding AG, an investment and advisory firm listed on the SIX Swiss Exchange (symbol: PGHN). Partners Group Luxembourg has been authorized by the CSSF to act as an Alternative Investment Fund Manager ('AIFM') since 1 March 2019.

Complaints Handling

Partners Group Luxembourg aims to assure the highest quality of services and deliverables. Nevertheless, it is recognized that in the conduct of its business activities, shortcomings can occur, which can lead to complaints.

Complaints must be submitted in writing, indicating contact details and a description of the complaint, to Partners Group Luxembourg by using the following address:

*Partners Group (Luxembourg) S.A.
Complaints Officer
35D Avenue JF Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg*

Within ten business days, Partners Group Luxembourg will send a written acknowledgement of the receipt of the complaint (unless the answer itself is provided within this timeframe). Partners Group Luxembourg will ensure that the period between the date of receipt of the complaint and the date of the response will not exceed one month. If the deadline cannot be met, the complainant will be informed of the reasons of the delay and an estimated date of response will be provided.

In the absence of a proper and timely response or in case of an unsatisfactory response within the above-mentioned period, the complainant may resubmit the complaint to the attention of the Board of Directors of Partners Group Luxembourg:

*Partners Group (Luxembourg) S.A.
Board of Directors
35D Avenue JF Kennedy
L-1855 Luxembourg
Grand Duchy of Luxembourg*

Where the complaints handling process did not result in a satisfactory answer within one month for the complainant, Partners Group Luxembourg shall inform complainants about the different means to contact the CSSF in order to file a request for the out-of-court resolution of their complaint. The request must be filed (in writing by post, fax or email) with the CSSF within one year after the complainant filed the complaint with Partners Group Luxembourg. To facilitate the out-of-court resolution of the complaint request, the CSSF provides guidelines and a specific form on its website: www.cssf.lu/en/consumer/complaints/

The CSSF contact details are as follows:

Commission de Surveillance du Secteur Financier
110, route d'Arlon
L-1150 Luxembourg
Tel: (+352) 26 25 1 – 1

Voting Rights

Partners Group Luxembourg has appointed Partners Group AG as the portfolio manager of the funds managed by Partners Group Luxembourg and, solely for the purpose of portfolio management of broadly syndicated loans, Partners Group AG has appointed Partners Group (UK) Ltd. as a sub-delegate (all together the 'Delegates'). Part of the role of the Delegates as portfolio managers is to exercise the voting rights on investments acquired by the funds in the best interest of those funds.

Partners Group Luxembourg directs the Delegates to apply the following guiding principles to its approach:

In the event any conflict of interest arises, Partners Group Luxembourg and the Delegates shall seek to address such conflict of interest in the most appropriate manner and in accordance with the applicable Conflict of Interest Directive as and when such conflicts come to their attention.

Conflicts of Interest Management

Partners Group Luxembourg seeks to appropriately manage conflicts of interest when they arise. However, where organizational arrangements to identify, prevent, manage and monitor conflicts of interest are not sufficient to ensure, with reasonable confidence, that risks of damage to investors' interests will be prevented, Partners Group Luxembourg shall disclose the general nature or sources of conflicts of interest to the investors.

Market Abuse Regulation (MAR) disclosures for Luxembourg Listed Products

A number of Partners Group entities act as either the investment manager or advisor to a number of listed products, whose shares or debt instruments are admitted to trading on an EU/UK regulated market or MTF/OTF. Consequently, Partners Group is required to make certain public disclosures of insider information in relation to the Market Abuse Regulation for the products in scope. These disclosures can be found here as and when such a case arises.

Sustainable Finance Disclosure Regulation (SFDR) disclosures

For SFDR disclosures, please visit our sustainability page [here](#).

Shareholders Rights Directive (Directive (EU) 2017/828) ("SRD II")

For more information, please click [here](#).