NEUBERGER BERMAN ASSET MANAGEMENT IRELAND LIMITED

COMPLAINTS POLICY

Version No.	9.2
Effective Date	February 2026
Previous Version Dated	February 2025

NEUBERGER

TABLE OF CONTENTS

1. INTRODUCTION

Neuberger Berman Asset Management Ireland Limited (**"NBAMIL"** or **"the Firm"**) is a wholly owned subsidiary of Neuberger Berman Europe Limited ("**NBEL**") and is an alternative investment fund manager and UCITS management company authorised by the Central Bank of Ireland (**"CBI"**)**.** It is also authorised by the CBI to perform the following services:

- Individual portfolio management;
- Investment advice (which include distribution and marketing); and
- Reception and transmission of orders in relation to financial instruments.

NBAMIL and its branches are therefore required to adhere to all relevant regulatory provisions set out by both the CBI and any additional local regulatory requirements as a result of their activities.

1.1. Purpose and scope

This document sets out the policy and related procedures of the Firm with respect to complaints (the **"Policy"**).

This Policy covers the course of action to be taken in the event that a client, or a person authorised to act for the client (referred to in this document as the **"Complainant"**), makes a complaint. Each Firm employee (the "**Employee**") must ensure that the requirements set out below are met.

The Consumer Protection Code of 2012 introduced by the CBI ensures a consistent level of protection for consumers regardless of the type of financial services provider they choose. As per the code, a regulated entity must have written procedures in place for the proper handling of complaints.

A "consumer" means any of the following: (a) a person of group of persons, but not an incorporated body with an annual turnover in excess of €3 million in the previous financial year (a group of persons includes partnerships and other unincorporated bodies such as clubs, charities and trusts, not consisting entirely of bodies corporate); or (b) incorporated bodies having an annual turnover of €3 million or less in the previous financial year (provided that such body shall not be a member of a group of companies having a combined turnover greater than the said €3 million; and includes where appropriate, a potential 'consumer' (within the meaning above).

Therefore, the CBI's Consumer Protection Code does not impact NBAMIL with regards to complaint resolution, as it generally only impacts retail clients, which the Firm and its subsidiaries do not have regulatory permissions to deal directly with.

1.2. Control

This Policy is set and adopted by the Firm's Board of Directors, and may only be amended by the Board; although minor changes or corrections may be made by NBAMIL Compliance, provided such changes are promptly notified to the Board. All Firm Employees will be notified of any material changes to this Policy.

2. OBLIGATIONS OF THE FIRM'S EMPLOYEES

It is the responsibility of all Employees to familiarise themselves with the contents of this Policy and report any complaints received to the Head of Compliance as soon as practicable.

Each complaint should be investigated promptly and thoroughly, handled properly and, where appropriate, fairly rectified. Complaints received will be handled free of charge.

3. DEFINITION

<u>A complaint is any expression of dissatisfaction, whether justified or not, either verbal or written, about the firm or the firm's appointed agents' provision of, or failure to provide a financial services activity.</u>

A complaint relating to the poor performance of a NB Fund must be treated as a complaint.

Regarding the funds: Any complaint received regarding either Neuberger Berman Investment Funds PLC ("NBIF") or Neuberger Berman Investment Funds II ICAV ("NBIF II") products should be directed to their respective Fund Administrator. The Fund Administrator will provide complaint details to the NBAMIL Head of Compliance on a regular basis, as well as providing reporting to the Board of either NBIF or NBIF II as relevant.

NBIF Fund Administrator: Brown Brothers Harriman Fund Administration Services (Ireland) Limited (**"BBH"**).

NBIF II Fund Administrator: JP Morgan Bank (Ireland) PLC

4. PROCEDURES FOR COMPLAINTS HANDLING AND GRIEVANCES

All complaints received must be notified to the NBAMIL Head of Compliance promptly once an Employee becomes aware of the matter.

For complaints expressed during the course of a telephone conversation or meeting, Employees should exact the complainant to submit it in writing, unless it can be resolved immediately.

Client complaints may be submitted to:

Neuberger Berman Asset Management Ireland Limited The Head of Compliance 2 Central Plaza, Dame Street, Dublin, D02 T0X4 Ireland Email: NBAMILCompliance@nb.com

The Employee receiving the complaint must provide the Head of Compliance with all details and correspondence relating to the complaint so that a full assessment of the facts can be made and an appropriate response can be provided. The response will take account of any legal and regulatory requirements and should include:

- the subject matter of the complaint;
- whether the complaint is to be upheld or not;
- what remedial action or redress (or both) may be appropriate; and
- if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.

The Head of Compliance will acknowledge receipt of the complaint to the Complainant in writing within 5 working days of having received the complaint.

The complaint will be handled by the Head of Compliance competently, diligently and impartially, obtaining additional information from the area to which the complaint is directed, or more widely within the Firm as required

Complaints received by NBAMIL or related to services or products provided by NBAMIL will be considered in line with the procedures set out in NBAMIL's Programme of Activity. NBAMIL will ensure that it maintains an effective and transparent system for the reasonable and prompt handling of all complaints.

The Head of Compliance shall be responsible for drafting the response to the Complainant. The NBAMIL Legal Department may be consulted by the Head of Compliance depending on the nature and seriousness of the complaint e.g. where litigation is potentially an issue.

Any communication with the complainant must be in clear, plain language that is easy to understand and should be provided to the complainant without undue delay. Upon receipt of the complaint, prompt written acknowledgement providing early reassurance that the Firm has received the complaint and is dealing with it will be provided; and the Firm will ensure the complainant is kept informed regularly thereafter of the progress of the measures being taken to resolve the complaint, including being provided with a direct point of contact.

It is possible that the complaint will also involve some form of error and/or breach resolution. If this is the case then the relevant error and breach escalation process should also be adhered to.

5. MONITORING OF COMPLAINTS

Compliance holds a register of complaints relating to and reported to NBAMIL. The Head of Compliance will ensure that a file is maintained of all written complaints received, including a record of any responses provided and actions taken as a result of the complaint. All written investor complaints received will be reported to NBAMIL's Board of Directors. An update to any complaint received will be provided in Compliance reporting to the Board on a quarterly basis until resolved.

As part of the Continuous Monitoring Programme, NBAMIL Compliance will ensure that the Complaints Register is reviewed quarterly to verify that all complaints received or outstanding have been dealt with in accordance with this policy.

6. VERSION CONTROL

Version No	Date of Review	Changes	Owner
1	December, 2017	General update	Kevin Ephgrave
2	January, 2018	MiFID II updates	Kevin Ephgrave
3	March, 2019	Update for NBAMIL.	Kevin Ephgrave
4	April 2020	Annual review of Policy – NB AIFM de-reg/removal, Swiss regulation removal, other minor changes and updates for NBAMIL.	Christina Korzeniowski / Kevin Ephgrave
5	November 2020	Additional references to FOS	Kimberley Walton
6	April 2021	Update of NBAMIL's regulatory permissions and that complaints will be handled free of charge.	Christina Korzeniowski
7	February 2022	Amend the NBEL policy into an NBAMIL policy	Winnie Donders
8	February 2023	NBAMIL New address Time requirement added (answer due within 5 days)	J Fallon
9	February 2024	Minor amendments	Winnie Donders / J Fallon
9.1	February 2025	Minor amendments, formatting, sections'order	V.Tran/ J.Fallon
9.2	February 2026	Minor amendments (i.e. NBIF II ICAV reference)	V.Tran