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Complaints Handling Policy for Pantheon-Managed Luxembourg Funds

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1. Purpose

The purpose of this policy is to provide clear, precise and up-to-date information on Pantheon Ventures (Ireland) DAC ("PVID") complaints handling procedures in accordance with applicable regulations relating to the out-of-court resolution of complaints. The policy is intended to ensure that complaints are dealt with properly and promptly.

For the avoidance of doubt, this policy is only applicable to the alternative investment funds, and respective sub-funds, as applicable, detailed in [Appendix 1](#).

2. How To Make a Complaint

The individual responsible for complaints received by PVID is Compliance Associate, Grace Kavanagh. A complaint can be made by phone or in writing (post or email). The complainant shall explain in detail the facts behind the complaint, providing all relevant supporting documentation if applicable

For complaint by post, please send to the following address:

*The Complaints Officer
Pantheon Ventures (Ireland) DAC Ella House
39-43 Merrion Square East Dublin 2
D02 NP96
Ireland*

For complaints by email, please send to grace.kavanagh@pantheon.com

For complaints by phone please call the following telephone number: +353 (1) 6426566

3. Processing Time for Complaints

PVID, or an individual on behalf of PVID, will acknowledge the complaint within **10 business days** of receipt and will inform the complainant of the name and contact details of the person handling the complaint.

A final written response will be sent to the complainant no later than **one month** after receipt of the complaint.

4. Recourse to Applicable Regulators Out of Court Resolution of Complaints

Where a complainant does not deem the final response received to be satisfactory, he/she may file a request with the Commission de Surveillance du Secteur Financier ("CSSF") in Luxembourg, within one year after the complaint was made with PVID.

This request should be made as follows:

- by completing the CSSF form online available at the following address:
<https://reclamations.apps.cssf.lu/index.html>
- by sending the completed [form](#) via post to the following address:

*Commission de Surveillance du Secteur Financier
Département Juridique
CC 283, route d'Arlon
L-2991 Luxembourg*

- or by email to the following email address: reclamation@cssf.lu

Appendix 1

Standalone AIF
Aallotar Feeder SCSp
Pantheon Global Co-Investment Opportunities Fund V (Luxembourg) SCSp
Pantheon Global Co-Investment Opportunities Fund V Feeder (Luxembourg) SCSp
Pantheon Global Co-Investment Opportunities Fund VI (Luxembourg) SCSp
Pantheon Global Co-Investment Opportunities Fund VI Feeder (Luxembourg) SCSp
Pantheon Global Infrastructure Fund II (Luxembourg) SCSp
Pantheon Global Infrastructure Fund IV (Luxembourg) SCSp
Pantheon Global Infrastructure Fund IV Euro (Luxembourg) SCSp
Pantheon Global Infrastructure Fund V (Luxembourg) SCSp
Pantheon Global Secondary Fund VI Feeder (Luxembourg) SCSp
Pantheon Global Secondary Fund VI SCSp
Pantheon Global Secondary Fund VII Euro Feeder SCSp
Pantheon Global Secondary Fund VII Euro SCSp
Pantheon Global Secondary Fund VII Feeder (Lux) SCSp
Pantheon Global Secondary Fund VII SCSp
Pantheon Global Secondary Fund VIII SCSp
Pantheon Global Select Fund VII (Luxembourg) SCSp
Pantheon Global Select Fund VII Feeder (Luxembourg) SCSp
Pantheon Global Select Fund VII Feeder SA SICAV-RAIF
Pantheon Global Select Fund VIII (Luxembourg) SCSp
Pantheon Global Select Fund VIII Feeder (Luxembourg) SCSp
Pantheon Global Select Fund VIII Feeder SA SICAV-RAIF
Pantheon Leonardo Fund SCSp
Pantheon Private Debt PCO II USD Feeder (Luxembourg) SCSp
Pantheon Private Debt PSD II EUR Feeder (Luxembourg) SCSp
Pantheon Private Debt PSD II USD Feeder (Luxembourg) SCSp
Pantheon Secondary Opportunity Fund (Luxembourg) SCSp
Pantheon Secondary Opportunity Fund Feeder (Luxembourg) SCSp
Pantheon Secondary Opportunity Fund II (Luxembourg) SCSp
Pantheon Secondary Opportunity Fund II Feeder (Lux) SCSp
Persea Private Credit Secondaries Program Feeder SCSp
Persea Private Credit Secondaries Program Master SCSp
PGCO IV Co-mingled Fund SCSp
PGIF 2026 EUR Feeder SCSp
PGIF 2026 SCSp

PGIF IP 2026 USD SCSp
PGIF IV Euro Feeder (Luxembourg) SCSp
PGIF IV Feeder (Luxembourg) SCSp
PGIF V EUR Feeder (Luxembourg) SCSp
PGIF V Feeder SA SICAV-RAIF
PGIF V USD Feeder (Luxembourg) SCSp
PGSF VIII EUR Feeder (Luxembourg) SCSp
PGSF VIII USD Feeder (Luxembourg) SCSp
PPDP PCO III USD Feeder (Lux) SCSp
PPDP PSD III GBP Feeder (Lux) SCSp
PPDP PSD III USD Feeder (Lux) SCSp
PPDP PSD IV GBP Feeder (Lux) SCSp
PPDP PSDE III Feeder (Lux) SCSp
PPDP PSDE III Feeder SA SICAV RAIF
PPDP Spear Feeder SCSp
PPDP Tubera Credit 2020 Feeder SCSP
PPDSS PCO IV USD Feeder (Lux) SCSp
PPDSS PSD IV USD Feeder (Lux) SCSp
PPDSS PSD IV USD Flex Feeder (Lux) SCSp
SOLUTIO Opportunities Asia I SCSp
SOLUTIO PREMIUM Private Debt I SCSp
SOLUTIO PREMIUM Private Debt II Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Debt II Master SCSp
SOLUTIO Premium Private Debt III Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Debt III Master SCSp
SOLUTIO PREMIUM Private Debt IV Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Debt IV Master SCSp
SOLUTIO PREMIUM Private Equity VI Feeder SCA SICAV-SIF
SOLUTIO PREMIUM Private Equity VI Master SCSp
SOLUTIO PREMIUM Private Equity VII Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Equity VII Master SCSp

Umbrella AIF*
Pantheon Access (Luxembourg) SLP SICAV SIF
Pantheon Multi-Strategy Program 2014 (Luxembourg) SLP SICAV SIF
Pantheon Private Debt Program SCSP SICAV-RAIF
Pantheon Private Debt Secondary Solutions SCSp SICAV-RAIF
Pantheon Private Markets SICAV SA
Pantheon Socrates SCA SICAV-RAIF
Pantheon TPM Private Debt Fund SCA SICAV-RAIF
PPDP Peridot 2022 Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Equity IX Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Equity IX Master SCSp SICAV-RAIF
SOLUTIO PREMIUM Private Equity VIII Feeder SCA SICAV-RAIF
SOLUTIO PREMIUM Private Equity VIII Master SCSp SICAV-RAIF

**and all applicable sub-funds*

