

# COHEN & STEERS

## COMPLAINTS AND LITIGATION POLICY

Complaints from clients, including shareholders in the Cohen & Steers funds, must be treated with the utmost importance and every effort should be made to resolve the matter promptly and fairly. Complaints and litigation may have an adverse effect on the reputation, regulatory status and financial position of Cohen & Steers, Inc., and its affiliates, including the funds (collectively “Cohen & Steers” or “the Company”), and may distract management from business activities. The SEC has not issued formal guidance to registered investment companies with respect to minimum standards for the handling of shareholder complaints and correspondence through FINRA has rules in place that are applicable to FINRA members that sell registered investment company shares. Notwithstanding the lack of SEC formal guidance in this area, the Company is concerned about Fund shareholder complaints and corresponding with those shareholders. The Funds have, therefore, adopted the policies and procedures set forth below.

It is Cohen & Steers’ policy to investigate all complaints and respond to all client and shareholder complaints in a timely manner.

### **Complaints**

Any statement, oral or written, alleging specific improper conduct on the part of the Company, including activities of persons under the control of the Company and in connection with the business conducted by the Company that affects the client, constitutes a complaint. A complaint must be initiated by a client or shareholder (or a third party on their behalf) and must allege a grievance. It may be difficult to judge whether or not a communication from a client constitutes a complaint. A client or shareholder’s mere statement of dissatisfaction or inquiry about an investment decision, or investment performance, or other activities of the Company that affect the client or shareholder in most cases does not constitute a complaint and can be directly resolved by the Company’s transfer agent. Allegations of negligence or misconduct would normally be considered a complaint.

All questions regarding whether a complaint has been made should be brought to the immediate attention of the General Counsel of Cohen & Steers.

- Handling of complaints. The General Counsel or a designee (hereinafter the “General Counsel”) will acknowledge receipt of the complaint and as soon as possible inform the client that it is being investigated. The General Counsel will then explore the validity of and reasons for the complaint and, after such consultation internally and/or with outside counsel as deemed necessary, the General Counsel will provide a response to the complainant and take all appropriate steps to remedy the complaint.
- Complaints Register. The Legal & Compliance department shall maintain a written register or log of complaints.
  - The complaints register should include what, if any, steps were taken by or on behalf of the Company in order to investigate, respond to, and resolve the complaint.
  - The complaints register should also include the date of receipt of the complaint and the dates of all subsequent actions taken.
  - If the complaint is made orally, the recipient of the complaint, must, at the earliest practicable time, prepare a written summary setting out the name of the complainant and

available contact information, the date the complaint was received and a sufficient description of the complaint to ensure that the precise nature of the complaint is understood and documented in the complaints register.

- Communication and filing with the Luxembourg Commission de Surveillance du Secteur Financier (the “CSSF”) (Cohen & Steers SICAV sub-funds only)
  - The CSSF may act as an out-of-court resolution body. Communication with the CSSF in relation to complaints shall be carried out in accordance with CSSF Regulation Nr. 16-07 relating to out-of-court complaint resolution, as may be amended from time to time, and in particular section 1 regarding provisions relating to the procedure before the CSSF.
  - The CSSF will be provided with an annual statement of the number of complaints received, the reason of complaints and the status of their handling.

### **Litigation**

If litigation has commenced, the primary responsibility for its assessment, monitoring and management lies with the Legal & Compliance department, which will coordinate with outside counsel as required.

- Cooperation with Legal & Compliance department. The affected business group(s) shall work closely with the Legal & Compliance department in identifying appropriate personnel to provide the facts relevant to the litigation, the identities of key personnel, and the existence and location of relevant documents.
- Document Preservation. The Company must ensure that relevant documents are retained and are not altered, destroyed, mutilated, concealed, covered up or falsified upon becoming aware that litigation or other legal process is threatened or commenced. The Company shall consult with the Legal & Compliance department to determine what steps, if any, should be taken to preserve documents relevant to the litigation or legal process.
- Reporting on Threatened and Pending Litigation.
  - The General Counsel will meet with senior management and the Chief Compliance Officer (“CCO”), as appropriate, to discuss any pending and threatened litigation matters.
  - The General Counsel will report on assessments of litigation matters, as necessary, to the CCO and to the Board of Directors of the funds.
  - Filing of Litigation Documents with Securities and Exchange Commission (U.S. Registered Funds only)

Pursuant to Section 33 of the Investment Company Act of 1940, as amended, every registered investment company which is a party and every affiliated person of such company who is a party defendant to any action or claim by a registered investment company or a security holder thereof in a derivative or representative capacity against an officer, director, investment adviser, trustee, or depositor of such company, shall file with the Commission, unless already so filed, (1) a copy of all pleadings, verdicts, or judgments filed with the court or served in connection with such action or claim, (2) a copy of any proposed settlement, compromise, or discontinuance of such action, and (3) a copy of such motions, transcripts, or other documents filed in or issued by the court or served in connection with such action

or claim as may be requested in writing by the Commission. If any document referred to herein (i) is delivered to such company or party defendant, such document shall be filed with the Commission not later than ten days after the receipt thereof; or (ii) is filed in such court or delivered by such company or party defendant, such document shall be filed with the Commission not later than five days after such filing or delivery.

**Record Keeping**

The General Counsel shall maintain copies of all material correspondence relating to any complaints and litigation.

The information regarding the above procedures will be made available to investors in shares of Cohen & Steers SICAV free of charge.

Adopted: October 2004  
Last Updated: February 2017  
Last Reviewed: December 2020