

## Allfunds Sweden AB - Complaints Management Function

According to Directive 2014/65/EU ("MiFID II"), an investment firm shall establish a complaints management function. As such, Allfunds Sweden AB ("Allfunds Sweden") has established an internal policy ("Complaints Management Policy"), which provides Allfunds Sweden a framework for the procedures and working methods for the handling of complaints from any clients or potential clients (the "Complainant") directly affected by Allfunds Sweden performance of or failure to perform its responsibilities under MiFID II ("Complaints Management Function"). Complaints may be submitted to the Complaints Management Function free of charge.

### Contact information

The Complaints Management Function of Allfunds Sweden can be contacted at: [atencionalcliente@allfunds.com](mailto:atencionalcliente@allfunds.com)

### Process of the Complaints Management Function

According to Allfunds Sweden's Complaints Management Policy, the Complaints Management Function will handle complaints effectively and in an independent manner and reply to the complaint without undue delay in a clear and plain language that is easy to understand. Upon receipt of a written complaint, Allfunds Sweden will acknowledge in writing (via email) the receipt of a complaint within five (5) working days.

Allfunds Sweden will aim to complete all investigations promptly and inform the Complainant of the expected time for the results of the initial investigations. Also, it will aim to notify a Complainant of the result of the initial investigation within ten (10) weeks of receipt of the written complaint, provided that the Complaints Management Function promptly receives all necessary information requested in connection to the complaint. If specific circumstances make it impossible to comply with this timeframe, Allfunds Sweden will inform the Complainant of the reasons for the delay and will indicate the period of time within it is possible to complete the investigation. This period of time cannot exceed twelve (12) weeks from the submission of the complaint.

In cases where a complaint can't be resolved according to the initial investigation process outlined above, the Complaints Management Function shall escalate the case internally to the Global Head of Compliance, the involved account manager and the CEO of Allfunds Sweden and call for a meeting to discuss the issues in the specific case. When deciding to reject or only partly accept a complaint, Allfunds Sweden will state its reasons for doing in reasonable detail to the Complainant in writing.

If a Complainant is dissatisfied with the outcome of an investigation or who are dissatisfied with Allfunds Sweden's progress in investigating a complaint, the Complainant may request that Allfunds Sweden refer the matter to an independent investigator such as a law firm, accounting firm or similar ("Independent Investigator"). Such request shall be approved by Allfunds Sweden, and Allfunds Sweden and the Complainant shall negotiate in good faith on the appointment of the Independent Investigator.

If a Complainant believes that the investigation process have not been carried out fairly neither by Allfunds Sweden nor the Independent Investigator, the Complaints Management Function may refer the complaint to an external independent arbitrator. The arbitrator decision shall be final.

## Allfunds Sweden AB

### Scope of the Complaints Management Function

The Complaints Management Function shall handle complaints related to Allfunds Sweden's investment services and ancillary services authorisations and licenses, including the cross-bordering of such authorisations and licenses. Areas such complaints regarding general dissatisfaction of day to day business matters and technical issues, as capital adequacy, liquidity requirements, tax, employment issues, data privacy etc., are not within the scope of responsibility of the Complaints Management Function. To be eligible to make a complaint in accordance with the Complaints Management Policy, a Complainant must be seeking a remedy in respect of a documented, direct loss, which has been suffered as a result of being directly affected by Allfunds Sweden's misconduct. Complaints must be made in writing, and the Complaints Management shall not be obligated to investigate a complaint which it reasonably considers;

- i. could have been, or would be, more appropriately dealt with in another manner; or
- ii. amounts to no more than dissatisfaction with Allfunds Sweden's general policies or with the exercise of discretion where no unprofessional or other misconduct, mistake, lack of care, unreasonable delay, bias or lack of integrity is alleged; or
- iii. to be clearly unfounded, including cases where the Complainant is clearly not acting in good faith or the complaint is clearly fictitious, frivolous or vexatious.

Complaints shall be made as soon as possible and no later than thirty (30) days following the date on which the Complainant first became aware or should have reasonably become aware of the circumstances giving rise to the complaint. Complaints made later than this will not be investigated by the Complaints Management Function according to the Complaints Management Policy unless the Complainant can show justifiable grounds for the delay and such delay is not caused by the negligence of the Complainant or anyone acting on their behalf.