



Complaints and Grievances Policy

Vol	0.2
Last Update:	Jan 2026
By:	Athos Myrianthous

1. Complaint or grievance handling

The Company has adopted effective, transparent, and documented procedures for the fair, prompt, and consistent handling of complaints and grievances received from AIFs, investors, and other relevant stakeholders, in order to ensure that the Company identifies, records, investigates, resolves, and reports complaints or grievances in a timely and professional manner. The Company shall keep records of each complaint or grievance and the measures taken for the complaint's resolution.

2. Assignment of Responsibility

a. Compliance Officer

Complaints and complaints are sent to the Compliance Officer as the first point of contact, who acts as the party responsible for the receipt, handling and investigating the complaints.

The Compliance Officer will investigate each complaint in co-operation with the affected Department(s) and records will be kept of the investigations. Where a complaint is non-trivial with no immediate resolution, the Compliance Officer will escalate the complaint to a member of Senior Management.

b. Heads of Departments

The Heads of Department will co-ordinate with the Compliance Officer for the handling and investigation of investor complaints. They will provide access to all communication and information and assist the Compliance Officer for the immediate resolution and corrective action.

c. Senior Management

All non-trivial complaints will be escalated to a designated Senior Management with the submission of an 'Investigation Report.' The designated member of Senior Management

shall take the necessary actions so that the complaint or grievance is properly addressed and corrective actions are taken.

3. General Principles

All units are required to handle complaints honestly, fairly and with professional integrity.

All Complaints should be resolved promptly and within a maximum of ten (10) working days from the date of official receipt of the complaint. If it is not possible to meet the aforesaid deadline, the reason must be recorded and an estimated date for resolution agreed. The expected closure date must be communicated to the AIF or the investor who filed the complaint within three working days of receipt.

A standardised form is used (the “Complaint Report Form”) as a template to guide the Compliance Officer in carrying out the investigation and is also instrumental in providing a one stop trail of all actions and decisions taken in respect of the complaint. Copies of all resolution letters are kept in record to have a clear audit trail for all complaints.

The complaint shall be sent to the Compliance Officer either in hard copy at the head offices of the Company or by email to the email address that will be provided to the AIFs and investors for this purpose.

The procedure which shall be followed by the Company, when handling investor’s complaints or grievances, is the following:

- All complaints must be submitted in writing, signed by a person authorised to act on behalf of the investor and should be as descriptive as possible in respect of the events that led to the filing of the complaint. Complaints which are unsigned and do not contain the name and other details of the applicant will not be considered. If an AIF or an investor communicates a complaint verbally or by any other means, he /she should kindly be asked to contact the Compliance Officer, who will then explain the procedure for handling complaints.

- A complaint or grievance is initially handled by the Compliance Officer. The employee receiving the complaint or grievance shall take the necessary actions so that the complaint or grievance is properly addressed. The Compliance Officer communicates all the complaints received to the respective Manager of the affected Department. The relevant Manager ensures that the investigation conducted is facilitated to the highest possible degree.
- The complaint or grievance in the Form that has been received, immediately (within three working days), should be forwarded to the Head of the department where the complaint is addressed.
- The Compliance Officer shall inform the AIF and investor that the complaint or grievance has been forwarded to the relevant department/personnel, providing all details so that the AIF and investor is aware who is dealing with his/her complaint or grievance.
- The Compliance Officer or the relevant Department, in addition to the above, should make all best efforts to ensure that in the case of the complaint or grievance being of such nature that can be resolved immediately, to do so that the AIF and investor will not have to pursue the filling of a formal complaint. The Compliance Officer or relevant Department in such a case shall not:
 - i Commit him/herself in any way to the AIF and investor
 - ii Address any issues in relation to best execution
 - iii Address any issues relating to legal issues
 - iv Commit the Company in taking any action prior to examining the issues in a formal manner

4. Procedure to be followed when a formal complaint or grievance is received

- a. When a written complaint or grievance is received by the Compliance Officer, this shall be forwarded to the relevant Department which is the most appropriate for dealing with the complaint.
- b. The Compliance Officer or member of the Department shall contact the AIF and investor to inform them that the complaint or grievance has been received and it is under investigation.
- c. Upon receiving a written complaint or grievance, the following details should be obtained and recorded:
 - The identification particulars of any AIF's and investors' having made a complaint or grievance.
 - The service provided by the Company and related to the complaint or grievance.
 - The employee responsible for the provision of those services.
 - The department where the employee belongs.
 - Date of receipt and registration of complaint or grievance.
 - Content of the complaint or grievance.
 - The capital and the value of the financial instruments/investments which belong to the AIF and/or investor.
 - The magnitude of the damage claimed by the AIF and investor.
 - Reference of any correspondent exchanged between the Company and the AIF and/or investor.
- d. The events leading to the complaint or grievance should be examined and assessed based on the information provided by the AIF and/or investor.
- e. The facts as stated by the AIF and/or investor have been examined and verified whether any additional information, need to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).
- f. All non-trivial complaints or grievances shall be brought to the attention of and their resolution should be approved by the Senior Management.

- g. Upon completion of the investigation a report shall be prepared stating the facts and brought to Senior Management's attention, which will decide on the formal response to the AIF and/or investor and the action to be taken.

In the case where an AIF and/or investor complaint or grievance is valid, the Compliance Officer (or Senior Management where the complaint was escalated) shall take such necessary action together with the Head of Department(s) to which the complaint or grievance is related in order to identify and verify:

- a. Reasons for failure of procedure followed.
- b. Weaknesses of the internal controls.
- c. Implementation of internal controls that would prevent any complaint or grievance in the future.

All suggested corrective actions for resolution shall be approved by Senior Management at the meeting following the completion of the investigation.

5. Record-keeping of complaints or grievances received

The Company shall maintain all complaints or grievances for a minimum period of five years after the termination of the business relationship. The Compliance Officer shall be the responsible party for the maintaining of records of all complaints and grievances received by the Company. Records should also include all investigation reports and corrective measures for resolution.