

GRIT

**GRIT FUND MANAGEMENT COMPANY LTD
COMPLAINTS MANAGEMENT POLICY**

12 DECEMBER 2023

1. INTRODUCTION

This Complaints Management Policy (the “Policy”) outlines how GRIT Fund Management Company Ltd (“GRIT”) handles investor Complaints, including details on how investors can submit a Complaint and the process that is followed when handling a Complaint. This Policy is prepared by the Compliance Function and annually reviewed and approved by GRIT’s board of directors.

This Policy is available to investors free of charge upon request and when GRIT acknowledges receipt of a Complaint. Additionally, the Policy is made available to all relevant staff of GRIT.

2. COMPLAINTS MANAGEMENT

2.1 Definition of a Complaint

A Complaint, in the context of this Policy, is defined as a statement of dissatisfaction addressed to GRIT by an investor, whether a natural or legal person, relating to the provision of a supervised activity provided by, or the conduct of, GRIT. A person submitting a Complaint is herein referred to as a Complainant.

2.2 Complaints management function

The complaints management process of GRIT is handled by the Compliance Function, primarily headed by the Compliance Officer. In the absence of the Compliance Officer, or in the event of a conflict of interest between the Compliance Officer and the complainant, the complaints management process is managed by their stand-in as defined in the Compliance Policy of GRIT.

2.3 Filing a Complaint

Investors can file a Complaint free of charge in writing either via e-mail or by post addressed to the postal address listed at the end of this Policy. The Complaint shall include the name and contacts of the Complainant, reasons for filing the Complaint, and a detailed description of the matter.

2.4 Complaints handling process

The Compliance Function acknowledges receipt, handles, investigates, and responds to all Complaints without undue delay. Acknowledgement of the receipt of a Complaint shall be issued within three business days. The Compliance Function is responsible for deciding on any actions taken as a result of a Complaint. When the investigation has been concluded, the Compliance Function provides a response on the Complaint to the Complainant. The response shall be in clear and easily understandable language. In cases where the Complainant is not satisfied with the response to their Complaint, the Complainant shall be informed on options for alternative dispute resolution.

GRIT does not process complaints regarding activities of another entities for which GRIT has no legal or regulatory responsibility and where those activities form the substance of the complaint. In such cases the investor shall be informed of GRIT’s position and be referred to the entity responsible for handling the matter.

Employees receiving a Complaint from an Complainant shall immediately inform the Compliance Function of the Complaint. The Compliance Function analyzes complaints and complaints-handling data to ensure that any risks or issues are identified and addressed.

To safeguard the integrity and interests of the Complainant, Complaints shall be handled confidentially.

The Compliance Function shall keep records of Complaints received and the actions taken to resolve them for five years. This information is provided to the Finnish Financial Supervisory Authority as necessary.

2.5 Alternative dispute resolution

In case of a dispute between a Complainant and GRIT that cannot be settled by mutual negotiations, a non-professional investor may refer the Complaint to an independent body, such as the Investment Complaints Board with the Finnish Financial Ombudsman Bureau, or take civil action.

3. CONTACT DETAILS

GRIT Fund Management Company Ltd

Compliance Function

Storalånggatan 34 C

FI-65100 VAASA

FINLAND

The Finnish Financial Ombudsman Bureau

Investment Complaints Board

Porkkalankatu 1

FI-00180 HELSINKI

FINLAND