

HANDLING OF CLIENTS` COMPLAINTS

09 January 2018

1. This guideline (hereinafter "**Guidelines**") sets forth the procedure for handling complaints filed by investors of fund management company AS Trigon Asset Management (hereinafter "**Trigon**").
2. "**Complaint**" is defined as any written statement or oral communication of an investor or any person acting on behalf of an investor (hereinafter: "**Investor**") alleging a grievance in connection with the solicitation or execution of any transaction or the disposition of securities or funds of that Client. Routine inquiries or expressions of concern about market conditions or performance are not considered Complaints.
3. Complaint may be submitted in Estonian, English or in any other official languages of the countries where the units of the funds are publicly offered. Written complaints may be submitted via e-mail to trigon@trigoncapital.com.
4. Trigon shall handle the Complaint fairly and without unnecessary delay. Within Trigon the procedure of resolving the Complaint shall be conducted by the Compliance Officer (hereinafter "**CO**"). Upon learning of the existence of a Complaint Trigon employees are obliged to immediately notify the CO of the matter and provide the CO with all information and documentation in their possession relating to the matter.
5. The CO shall promptly initiate a review of the factual circumstances surrounding the Complaint and recommend appropriate action, if any, to senior management.
6. The deadline for handling a Complaint is 15 days in the case of a complaint by a natural person and 30 days in the case of a Complaint by an entity unless, due to the complexity of the Complaint or other compelling circumstances that prevent the Complaint from being resolved within the time periods described above. In such case, the client will be informed of the prolonged period and the reasons thereof.
7. The resolution to Complaint will be provided to the Investor in the format that can be reproduced in writing and shall include at least the following:
 - Date of the Complaint and the name of the Investor who submitted the Complaint;
 - Contents of the Complaint;
 - Methods used and actions taken in order to determine the background and circumstances concerning the Complaint;
 - Solution/proposal for resolution or the reasons why the Complaint shall not be resolved; and
 - Possibilities of appealing the decision.
8. The resolution will be provided in Estonian for Estonian Investors and in English for Investors from other countries.
9. All relevant documentation relating to the Complaint shall be registered, documented and archived by the CO.