

Complaints Handling Policy

Adopted by:	The Board of Directors
Date of adoption:	2020-05-05
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Legal or other basis:	Swedish UCITS Act, FFFS 2013:9, FFFS 2002:23
Policy owner:	CEO
Policy no	11

1 Background

Movestic Kapitalförvaltning AB, Corp. ID 556760-8780 (hereafter referred to as the “Company”) is a Fund Management Company authorised according to the European Council Directive 2009/65/EC, as implemented in Sweden through the law on undertakings for collective investments in transferable securities (UCITS) (*Lag (2004:46) om värdepappersfonder*). The Company is domiciled at Birger Jarlsgatan 57B, S-103 99 STOCKHOLM, Sweden. It is a wholly owned subsidiary of Movestic Livförsäkring AB (“Movestic Liv”) domiciled in Sweden. The Company serves as Management Company for a number of investment funds under the brand name “Movestic” (hereafter the “Funds”) in Sweden. The Company is under the supervision of the Swedish Financial Supervisory Authority (“Finansinspektionen”).

The purpose of the Company is the management of Sweden and, if applicable, foreign domiciled undertakings for collective investments in transferable securities (UCITS) which are authorised in accordance with the European Council Directive 2009/65/EC. The Company also provide portfolio management services for funds under management by third party management companies.

The Company aims at creating and maintaining among its employees, senior management and directors (the “directors” or the “board of directors”) a culture of treating all investors fairly and diligently. As part of its commitment to quality and customer service, the Company encourages feedback on the services provided to investors in the funds under management.

2 Purpose

The purpose of this policy is, against the background above, to outline the basic principles for the identification, recording, handling and efficient resolution of investor complaints. Part of the processes related to investor complaints may be delegated through to distributors or transfer agents by the Company. When such delegation is undertaken, the work processes are delegated, however the Company always retains full responsibility for the services delegated. This policy covers also delegated services.

Table 1 Definitions used

Term	Meaning
The Company	Movestic Kapitalförvaltning AB
The Funds	Funds under management of the Management Company
Complaint Manager	The person within Senior Management appointed to register, handle and administer investor complaints
Senior Management	The CEO and his/her deputy
Complaint	A Complaint is a statement of dissatisfaction addressed to the Company by a natural or legal person relating to the provision of an investment service provided under the UCITS directive or a service of collective portfolio management under the UCITS directive, as amended from time to time
Complainant	A Complainant is any natural or legal person having filed a Complaint

3 Application and scope

This policy is applicable to investors into all financial services products managed by the Company (hereafter referred to as “the Funds”). This policy shall be made available to all relevant staff through publication on the intranet site and through inclusion in the procedures manual of the Company.

4 Principles for the handling of Investor Complaints

- Making a complaint shall, as far as reasonably possible, be made free of charge for the complainant.
- All investors and all complaints received from investors shall be treated fairly and diligently.
- The Company shall handle complaints in a professional, correct and prompt manner and in accordance with internal guidelines and rules. Potential conflicts of interest shall be identified as soon as possible and shall be mitigated to the extent possible and in accordance with the Conflict of interest policy.
- The company shall, upon receipt of a complaint, acknowledge receipt of such received complaint and inform the complainant of receipt of the complaints, the name of the person handling the complaint including contact details to such a person.
- Complaints shall be responded to in a plain and easily comprehensible language. Regardless of the language of the complaints being filed, the company shall respond in English or Swedish, whichever is more suitable for the Complainant.
- The Company aims for responding to each received complaint as soon as possible after receipt. The Company shall provide an answer without undue delay in any case.

- Complaints shall be duly reported internally to the CEO and to the board of directors of the Company.

5 Delegation of transfer agent services and distribution responsibilities

The Company may delegate distribution services for its financial services products under management. In such cases the Company shall ensure that proper arrangements to act in the best interest of the investors as well as the proper handling of investor complaints are in place.

When the Company delegates services to a third party, the service provider will be required to have its own policy for the proper handling of investor complaints whose standards are at least equivalent to the standards describe in the policy of the Company or apply the policy of the Company delegating such services. Furthermore, in such cases, the contractual relationship between the service provider and the company shall ensure its right, in agreements and/or service level agreements (SLA) to receive regular information regarding all investor complaints received and administered by the delegate.

5.1 Controls of complaints handling

The handling of complaints performed by the Company itself or by delegate distributors and/or transfer agents, paying agents or other entities which may receive a complaint, shall be subject to regular controls. Such controls shall be performed in accordance with the complexity of the distribution network, both in terms of the number of appointed agents and sub-agents, and in geographical reach.

The results of the controls performed regarding the handling and administration of investor complaints shall be reported to the senior management and board of directors of the Company with regular intervals.

6 Complaints Management Function

In order to ensure a consistent and investor-oriented approach in the handling of investor complaints, the Company has designated the CEO as the Complaint Manager. This person shall be responsible for the handling, documentation and follow up of all investor complaints reaching the Company.

6.1 Identification and registration of investor complaints

- Identification. The Complaint Manager takes note of and identifies each potential complaint which is sent directly to the Company. For each delegation of distribution responsibilities, to distributors, sub agents, or transfer agents, the Complaint Manager organizes a regular reporting to the Company. The reporting shall be organized in such a way that efficient escalation and regulatory reporting can be made swiftly and correctly.

- Registration. The Complaint Manager ensures that a register be kept of all received complaints. The register shall contain the date of receipt, mail exchange with the complainant, actions taken, preventive measures, and any applicable resolution or escalation.
- Resolution. As a basic principle, the Complaint Manager shall liaise with the relevant responsible unit or department within the Company or within the network of delegated services in order to resolve the complaint brought forward. In each case, the investor Complaint Manager shall be the main point of contact and shall provide reasonable assistance to ensure that all complaints are lodged effectively.
- Root cause analysis. The Complaint Manager shall regularly analyse the data relating to the registered complaints, in order to identify the root cause problem relating to the complaints, to find systematic problems or error causing complaints as well as identifying appropriate preventive action to avoid problems to reoccur.
- Internal information. The Complaint Manager reports each complaint to the senior management for information.
- Notices: The Complaint Manager will seek to acknowledge receipt of the complaint within ten (10) business days, unless the answer itself is provided to the investor within this period. The Complaint Manager should answer the complaint as soon as possible and no later than within a month from the receipt. Where an answer cannot be provided within one month, the Complaint Manager shall inform the investor of the causes of the delay and indicate the date at which the examination is likely to be achieved.

6.2 Escalation of investor complaints

If the investor is not satisfied with the solution proposal received from the investor Complaint Manager, the investor will be invited to raise his complaint up to the Board level of the Company (the relevant details thereof, including the process of escalation will be provided to the investor free of charge from the Complaint Manager).

If the final solution proposal by Senior Management fail to meet the investor expectations, the Company will provide the investor in writing with a full explanation of its position as regards the complaint and inform the investor about the possibility to file a request with the national board for consumer disputes or by a public court. This information should be provided no later than when a complaint is rejected by the Company.

Internally within the Company, in case the complaint cannot be resolved at the level of the Complaint Manager, it shall be promptly escalated further. Escalation shall be made to the Board of Directors of the Company. The Board will provide a final decision regarding the resolution and treatment for complaints.

7 Entry into force and review

This policy has been adopted by the board of directors for the Company and enters into force immediately upon adoption.

The policy will be adopted annually, even when no amendments have been made to its content. The policy should be reviewed and adjusted as needed over the course of the year, after which it should again be adopted by the board.

8 Medium for filing of an investor Complaint:

- Website

<https://www.movestickapital.se/>

- Telephone to Complaints Manager

Switchboard: 0046 8 120 392 00

Complaints Manager: Anders Malcolm

- Email

klagomal@movestickapital.se

- Letter

Movestic Kapitalförvaltning AB

To: Klagomålsansvarig / to the Complaints Manager

Birger Jarlsgatan 57B, 113 56 Stockholm, Sverige