

Handling Client Complaints Policy

This policy has been compiled by AS Avaron Asset Management (hereafter "Avaron"), address Narva mnt 7d, 10117 Tallinn, Estonia, phone +372 664 4200, web www.avaron.com, e-mail avaron@avaron.com. The policy has been compiled with a purpose of providing the necessary information to Avaron clients, potential clients and fund unit-holders on how client complaints are handled in Avaron.

- If a client has complaints regarding the services provided to the client by Avaron, the client may turn to his/her client relationship manager or another contact person in Avaron.
- The language of communication with clients is generally English and Estonian. The unit-holders of
 UCITS funds managed by Avaron are able to file complaints in the official language or one of the
 official languages of their Member State where the UCITS fund has been registered for public sale.
- The complaint may be filed via telephone, e-mail or mail. The means of communication and provision of information shall be agreed upon with each portfolio management client separately in the relevant service agreement.
- The client shall be promptly notified by telephone or e-mail when Avaron receives the complaint and shall be given additional information on the process of solving the complaint. Complaints shall be handled as soon as possible. Within 15 days Avaron notifies the client about the solution of the complaint or the reasons for the extension of the proceedings and the additional deadline.
- When filing a complaint, the client shall include his/her name, contact details and the suitable mean of communication to receive the answer from Avaron.
- The client has a right to file a complaint regarding the services provided by Avaron to Estonian Financial Supervision Authority, www.fi.ee.
- Any disputes or controversy between Avaron and client shall be settled by mutual negotiation. If no agreement is reached, the disputes shall be settled by the Harju County Court (Harju Maakohus).