


Client Complaints Management Policy

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	Policy Document		
	Owner	Reviewer	Adopted by
	The Complaints Manager	Chief Compliance Officer	The Board of Directors
	Date of approval	Applicable from	Classification
	2022-08-24	2022-08-24	Disclosure allowed

Introduction

According to article 26 Commission Delegated Regulation (EU) 2017/565¹ Investment firms shall establish, implement, and maintain effective and transparent complaints management policies and procedures for the prompt handling of clients' or potential clients' complaints. This policy must be followed when a client in a particular case expresses dissatisfaction with how IKC has handled a financial service. The purpose of these guidelines is to make sure that complaints will be handled in an effective and appropriate manner and in accordance with applicable rules.

Employees affected by this policy

All employees at IKC are subject to this policy. However, there are positions for which the policy is of particular importance:

- Those appointed by the IKC to handle complaints.
- Personnel working within the Compliance function.
- Personnel providing discretionary portfolio management services, sales personnel, and their assistants.

Management must be familiar with the contents of this policy and keep itself updated on eventual changes of its content. All employees concerned must be informed about the policy and be continually trained regarding the handling of complaints.

Definition of complaint

A complaint is when a client in an individual case submits a specific dissatisfaction with how IKC has handled a financial service. General comments and general dissatisfaction are not considered complaints in this context, nor is dissatisfaction that may be of little significance to the client.

Complaints Manager

IKC must appoint a person to be the Complaints Manager. The Complaints Manager receives documents and investigates complaints submitted by clients. The Complaints Manager must ensure that there is a functional system for contacting clients in complaints cases.

¹ of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organizational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive

How the client should be treated

A client who submits a complaint must be treated in a respectful and professional manner. This applies even if the complaint is unfounded. An essential point when handling client complaints is that no consideration should be given to irrelevant factors such as the client's origins, how much the client has invested with IKC, gender etc. Equal cases should be handled in the same way.

Handling of complaints including the decision-making procedure in such cases

If any of the company's other employees receive a complaint from a client the employee must refer the client to the Complaints Manager and forward the complaint to them.

Upon receiving a complaint, the Complaints manager must ensure that the client receives a written confirmation informing that the complaint is under investigation. Furthermore, this confirmation must include information on approximately how long IKC will need to investigate the case.

The Complaints Manager must investigate the complaint. Normally, this is done by getting input from consultants or Back Office and through asking the client clarifying questions.

If the Complaints Manager decides that no action will be taken in response to the complaint, such as paying compensation, the client must be immediately notified of this decision. This notification must include information on the opportunity to refer the matter to the CEO.

If the Complaint manager decides that IKC shall compensate the client in any way the Complaints manager must submit a recommendation to the CEO who makes the final decision. If appropriate, the CEO should ensure that the client receives the compensation and is satisfied. The client is normally informed of the CEO's decision through the Complaints Manager.

A complaint must be handled promptly. If no response can be given in 14 days the complainant must be informed within this time of how the case is progressing, the reason for the time delay and when a decision can be expected.

Registration and documentation.

Complaints received must be registered in a central register and the cases must be documented in such a way that it is possible to subsequently monitor the handling of a case. The documentation must be kept for at least five years.

Information to the client

The client must be informed how the complaint should be submitted to IKC, how a case with a negative decision can be forwarded within the company and how the company handles such cases. The customer must also be informed of the opportunities available to contact the authorities or any other external agencies. This information must also be available on IKC's website.

Information to the Management Company

The Company must ensure that all Investor Complaints handled will be forwarded for information purposes to the complaints handling officer of the Management Company (Coeli Asset Management AB) on an annual basis.

Information to the Swedish Financial Supervisory Authority

IKC must inform the Swedish Financial Supervisory Authority which employee within the company who has the role of the Complaints Manager and forward relevant contact information regarding the institution's complaints handling. The Swedish Financial Supervisory Authority must be promptly notified of any changes.

Monitoring and reporting

The Complaints Manager must ensure that IKC follows up on complaints that have been submitted so that mistakes are not repeated and that IKC otherwise takes advantage of the experience from the submitted complaint.

The Complaints Manager must regularly report complaints to IKC's management and board. If the Compliance Department is also responsible for complaints the complaints must be included in the Compliance report.

Information and publishing

There must always be updated information available on IKC's website about how clients can submit a complaint. Clients shall be entitled to receive a copy of this policy upon request.

Updates and amendments

The Board of the Company will regularly, but at least annually, evaluate and revise this policy. Changes will take effect from the date specified above.