

HANDLING OF CLIENTS` COMPLAINTS

6th June 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 Investor. Routine inquiries or expressions of concern about market conditions or performance are not considered Complaints.
3. Provided the Investor has expressed his discontent to Trigon's services, the Investor shall be informed within 5 banking days of the following:
 - Recommendation to submit the Complaint in a written form via e-mail to trigon@trigoncapital.com in case the Investor has expressed its discontent only verbally;
 - Data that should be presented in the Complaint and that includes the name of the Investor, date of the Complaint, contents of the Complaint, other relevant information and documentary evidence;
 - Form of communication to be used to keep the Investor informed of the case which by preference is e-mail or other form that can be reproduced in writing.
4. 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.
5. 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.
6. The CO shall promptly initiate a review of the factual circumstances surrounding the Complaint and recommend appropriate action, if any, to senior management.
7. 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.
8. 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.
9. The resolution will be provided in Estonian for Estonian Investors and in English for Investors from other countries.
10. All relevant documentation relating to the Complaint shall be registered, documented and archived by the CO.

Documents of proof

Document of proof	Compiler of the folder	Deadline for storing	Storing location
Material reported	CO	5 years	\\capitalsrv01\Lawyer\ASSET MANAGEMENT\AM

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HISTORY OF THE VERSION

VERSION	DATE	CHANGES	COMPILER
01	09.01.2018	Removed referrals to Trigon Funds and Trigon Wealth Management. Procedure completely re-written	M. Mõistus
02	06.06.2018	Added point 3 (new numbering) about additional data Investor should provide to Trigon about the Compliant.	M. Mõistus