

Complaints Handling

UpToMore B.V.

1. Objective

The objective is to set out a procedure ensuring that clients' complaints are treated with care, in a consistent way, and within a reasonable period of time.

Client complaints can be an important signal on the way the Company functions.

The Company is committed to provide a quality and professional service, acting with honesty, integrity and transparency. The way in the Company handles and resolves complaints is consistent with the high levels of service the Company aims to provide to all of its clients.

2. Complaints handling procedure

Definition of complaint

A complaint under this Policy is defined as “a statement of dissatisfaction addressed to the Company by a person relating to his/her (prospective) investment in the Fund and/or the service he/she has been provided with”.

Complaints procedure

Unitholders with a complaint are requested to file a formal complaint in the way indicated on the Website. Unitholders must be able to file their complaints in the official language or one of the official languages of their home country.

Once a complaint has been received, the Compliance Officer and the relevant Employees investigate:

- the subject matter of the complaint;
- whether the complaint should be upheld;
- what redress/remedial action may be appropriate; and
- whether another respondent is solely or jointly responsible.

Acknowledgement of the complaint

The Compliance Officer ensures the complainant receives a prompt written acknowledgement providing early reassurance that the Company has received the complaint and is dealing with it.

The acknowledgement of receipt of the complaint is provided to the complainant, without undue delay and in any event, within five business days from the date of receipt of the complaint, unless the answer itself is provided within such period. Ultimately within two weeks after receipt of the complaint, the Company will inform the complainant about the ultimate date on which the Unitholder can expect a response to the complaint. For transparency purposes, the complainant will be informed about the name and contact details of the person handling the complaint.

Response to the complaint

The Compliance Officer will inform the complainant about the follow-up and status of the complaint. In any case, the complainant will be provided with an answer within one month starting from the date of receipt of the complaint.

The Company sends the complainant a final response. The final response offers remedial action or rejects the complaint and gives in any case reasons for doing so. The final response also informs the complainant in writing or by way of another durable medium, how to pursue his complaint if the complainant remains dissatisfied.

The complainant can submit the complaint directly to the Dutch Financial Services Complaints Authority (*Klachteninstituut Financiële Dienstverlening*, "KiFiD") from six weeks after receipt of the confirmation of receipt or eight weeks after submitting the complaint. If the Company requires further information from the complainant for the settlement of the complaint, it will request this information from the complainant and give a term for a response. The deadlines are extended by the deadline for replying, or by the deadline within which the requested information is received by the Company.

Rejection of the complaint

When the final response is to reject the complaint, there is the possibility for the complainant to escalate the complaint to the BoD. In case of remaining dissatisfaction from the complainant, the Company informs the complainant, in writing or by way of another durable medium, of the existence of the out-of-court compliant resolution procedures at KiFiD.

When a complaint is totally or partially rejected, the complainant is informed about the possibility of submitting the complaint to KiFiD for a binding opinion, stating the applicable deadlines. This has to be done within three months, starting on the day that the complaint has been (totally or partially) rejected.

The complainant will be informed to download the complaint form from the website of KiFiD (www.kifid.nl) and send it to:

KiFiD

PO Box 93257

2509 AG The Hague

In addition, the complainant is also informed about the option to submit its complaint directly to the competent court for judicial settlement.

Registration of the complaint

The Compliance Officer will record and register at least the following information:

- name and address of the complainant;
- the complaint, including date of receipt;
- description of the complaint; and
- a description of how the complaint has been settled.

Complaints will be registered in the complaints register. If multiple clients report the same complaint, each complaint should be recorded as a separate complaint in the register. The information is registered and stored for at least a period of one year, starting on the day that the complaint has been settled.

3. Confidentiality

All complaints are treated confidential. The data from the complaint is only stored in the complaints register and it is forbidden to store this data on private computers or smartphones of employees. This Policy is available to all employees and applies to complaints handling.

4. General Data Protection Regulation

The Company is committed to ensuring compliance with relevant provisions of the GDPR. The Company's procedures with respect to privacy are published on the website of the Company.

5. Reporting, prevention and continuous improvement

The Compliance Officer will record the complaints in the periodic compliance report and provide this to the BoD. The Company provides information on complaints and complaints-handling, to the extent requested or mandatory, to the relevant competent authority and, where applicable under national law, to venues for alternative dispute resolution.

6. ODR

The Company is an online service provider. Unitholders can therefore also register their complaint with the Online Dispute Resolution (ODR) platform. This ODR platform can be found at <http://ec.europa.eu/odr>. The Company will inform the Unitholders on its website of the existence of the ODR platform and the possibility of using it for the settlement of disputes, including placing an electronic link to the ODR platform. If the Company makes an offer of services via email, it will also include a link to the ODR platform in the email. An electronic link to the ODR platform is also included in the Company's general terms and conditions.