

DECA INVESTMENTS AIFM



Complaints Policy

I. Introduction

Managers of Alternative Investment Funds must follow the guidelines for handling complaints against the securities sector (ESMA) and the banking sector (EAT), which are issued under Article 165 of Regulation 105/5 ESMA 109.

The goal of DECA Investments AIFM, hereinafter referred to as "the Company", is to continuously improve the services provided to shareholders and customers (funds advised). Effective complaint management is fundamental to providing quality services. To this end, the company has developed and established the Complaints Policy, which is designed to provide guidance on how the company receives and manages complaints.

In addition to the above, the purpose of this policy is to manage the complaints of employees or third parties (associates) in relation to the violation of policies and procedures of the Company and relevant legislation (i.e. non-compliance with the Code of Conduct, policies, labor relations, discrimination, corruption, money laundering, anything that could damage the company's reputation or any attempt to cover up the above).

As part of this Policy, employees or third parties may, by name or anonymously, report to info@decainvestments.eu any complaints regarding any of the above issues. In case of a personal complaint we assure that there will be no negative consequences for the person submitting the complaint. In case of an anonymous complaint, please report any relevant information as there will be no contact for clarification and further information about the investigation of the complaint.

The implementation of this policy will ensure that the complaints received are submitted and handled in a fair, direct, effective and confidential manner.

II. Procedure for applying complaints

Complaints may be submitted:

- 1) By mail directly from customers (funds advised) or employees or third parties (associates) to the Company.
- 2) By mail from the Regulatory Authorities (indicatively stated by the Hellenic Capital Market Commission)
- 3) By e-mail to: info@decainvestments.eu

The Complaints Policy, together with the complaint form, will be posted on the company's website in Greek and English language.

III. Management of complaints

- Complaints submitted to the company by the Regulatory Authorities require a response within 10 days from the date of receipt and the management of other complaints will be made no later than 45 days from receipt, as defined in PDTE 2501/2002.
- Complaints are explored in depth, examined effectively and treated with sensitivity.
- All complaints are treated the same for everyone.
- The company will be fair to the customer (Fund advised) who can report a complaint.
- Compliance with Regulation 679/2016 on Personal Data Protection is guaranteed at all times.

- Complaints are recorded and analyzed on a regular basis to identify and correct incorrect procedures and practices, as well as to avoid repeated omissions.
- The Board of Directors, the Management and the employees recognize the right to file a complaint and are committed to the effective and fair resolution of these or the problems that may arise from the services provided.

The company does not consider any complaints submitted to it in the following cases:

- If the complaint is made orally
- If the complaint is subject to proceedings before a Court or pending for this Court decision.
- If in the meantime the dispute between the two parties is settled.
- If the case involves criminal offenses prosecuted ex officio.
- If the complaint is submitted by a "non-customer" of the company.

IV. Recording Complaints / Complaints

Complaints, results and actions taken are recorded in an electronic file and used to improve the Company's services.

Any complaint must be submitted in writing by the client (funds advised) and the response must be in the form of a written letter. Each complaint will be examined by the Operations Manager of the Company and by a member of the Board of Directors. The answering letter to the customer (fund advised) will be signed by the representatives of the company as defined by the minutes of the Board of Directors.

V. Informing the Board of Directors - Keeping a File

Annually, after the end of the calendar year, the Operations Manager must inform the Board of Directors of the Company at least about the number of complaints submitted during the previous year and the average response of the company. The members of the Board of Directors can request any relevant document of the submitted complaints.

Annually, after the end of the calendar year, the Operations Manager must inform the Audit, Risk and Regulatory Compliance Committee and the Internal Auditor of the company at least of the number of complaints / grievances submitted during the previous year and the average company response. The Audit, Risk Control and Regulatory Compliance Committee must then inform the Company's Board of Directors. The members of the Board of Directors can request any relevant document with the submitted complaints.