


Client Complaints Management Policy

	Type of Document		
	Policy Document		
	Owner	Reviewer	Adopted by
	The Legal Function	The Compliance Function	The Board of Directors
	Date of approval	Applicable from	Classification
	November 27 2025	November 27 2025	Disclosure allowed

Background

IKC Capital AB, with Swedish corporate registration number IKC Capital AB (hereafter the “**Company**”), is an authorized MiFID investment firm (Swe. *Värdepappersbolag*) that is subject to the supervision of the Swedish Financial Supervisory Authority (Swe. *Finansinspektionen*) (the “**SFSA**”).

In short, the Company is – under the following rules – required to establish internal rules specifying the procedures the Company has in place for handling complaints from clients:

- Art. 26 of Commission Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive
- The Joint Guidelines on complaints-handling for the securities (ESMA) and banking (EBA) sectors (JC 2014 43), and
- The SFSA’s general guidelines on Complaints Handling in Respect of Financial Services Provided to Consumers (FFFS 2002:23).

This Policy has been drafted in accordance with these rules.

Policy Objectives

The objectives of this Policy is to detail the Company’s handling of clients’ complaints, namely:

- Timely and effective resolution of complaints with the client’s interests in mind
- Clear and transparent information provided to the client
- Reporting channels to the Board of Directors and senior management

Applicability and Scope

This Policy applies to the process of handling client complaints.

All employees of the Company must acknowledge this Policy and inform the Complaints Officer of all complaints received. As such, all employees of the Company are subject to this Policy.

Functions within the Company in particular affected by this Policy include, but are not limited to, the Complaints Officer, the Compliance Function, the Risk Function, the Board of Directors as well as other operational areas of the business.

Definitions

Compliant: a client expressing, in an individual case, a specific dissatisfaction with how the Company has handled a financial service or product. General feedback, expressions of dissatisfaction of a general nature, or matters deemed to be of minor importance to the client shall not, for the purposes of this Policy, be considered complaints.

Complaints Officer: The person within the Company appointed by the Board of Directors. The Complaints Officer shall receive, document, and investigate complaints, and shall ensure that an effective process is in place for maintaining contact with clients regarding complaints.

Roles and Responsibilities

Each employee of the Company: Report any received complaints to the Complaints Officer.

Compliance Function: The Compliance Function is responsible for monitoring compliance with this Policy and assessing its effectiveness, as well as reporting on these matters to the Board of Directors.

Complaints Officer: The Complaints Officer shall serve as the primary contact person for clients submitting complaints to the Company. The responsibilities include the registration of complaints, the preparation and documentation of each case, including information regarding its handling, as well as the response to the client, all in accordance with this Policy. The responsibilities of the Complaints Officer also include ensuring that the Company has effective and appropriate procedures in place for receiving, investigating, and following up on complaints. As part of this responsibility, the Complaints Officer shall ensure that appropriate internal reporting procedures are established to provide information to the Board of Directors. The Complaints Officer shall be responsible for reviewing and updating this Policy as necessary and at least once a year. The Complaints Officer shall also ensure that information regarding the Company's complaints handling procedures, as well as guidance on how clients may submit a complaint, is available on the Company's website.

The Complaints Officer function is provided by Coeli Asset Management AB pursuant to an outsourcing agreement.

Changes of Complaints Officer shall be notified to the SFSA.

Board of Directors: The Board of Directors shall adopt this Policy and its contents and is responsible for ensuring that the Company has an effective organization for the handling of client complaints.

Chief Executive Officer (CEO): The Company's CEO is responsible for deciding how a complaint shall be handled, based on proposals from the Complaints Officer. The CEO also has the authority to appoint another individual to assume the role of Complaints Officer if deemed necessary and otherwise appropriate.

The Company's principles for complaint handling

The Company's handling of complaints is guided by the following principles.

Client interaction

A client submitting a complaint shall be treated with respect and in an objective manner. This applies even where the complaint is unfounded. A fundamental principle in the handling of client complaints is that no consideration shall be given to irrelevant factors such as the client's origin, the size of the client's investment, gender, or similar circumstances. Comparable cases should be treated consistently.

Complaints may be submitted free of charge.

The Company shall in its interactions with clients provide information in a clear, transparent, and comprehensible language. Upon a client's request, all communication shall be in writing.

Handling and processing of complaints, including the decision-making process

Handling and processing of complaints

The Complaints Officer is responsible for managing complaints received. If any other employee of the Company receives a complaint from a client, the employee shall refer the client to the Complaints Officer and forward the complaint accordingly.

The Complaints Officer shall gather all relevant information from the client and, where appropriate, from internal colleagues concerning the relevant circumstances.

The Company's handling of complaints shall be carried out promptly and efficiently. The Complaints Officer shall ensure that the process is conducted with due care and objectivity.

The Complaints Officer shall keep the client informed of the status of the complaint. If no response can be provided within 14 days, the complainant shall, within this period, be informed by the Complaints Officer of the progress of the matter, the reasons for the delay, and when a decision can be expected.

Recommendation for decision

Following investigation, the Complaints Officer shall submit a recommendation to the Chief Executive Officer regarding how the complaint should be addressed. The recommendation shall indicate whether the Complaints Officer considers that the client should receive financial compensation and shall primarily be based on an assessment of whether, and to what extent, the Company has breached its obligations under applicable law, regulation, or its own internal rules, or whether the Company has otherwise acted in a manner inconsistent with what may reasonably be expected of a financial institution.

Decision

The decision on whether the complaint shall be upheld or dismissed shall be made by the Company's Chief Executive Officer (CEO). The decision, together with the reasoning for it, shall be communicated to the client in writing through the Complaints Officer. If the decision entails that the client is to receive financial

compensation, the CEO shall ensure that such compensation is paid. The CEO's decision shall be deemed final and not subject to appeal. This shall be clearly stated in the communication to the client. Instead, the Complaints Officer shall ensure that the client is informed of the possibility to have the dispute reviewed by the Swedish National Board for Consumer Disputes (Swe. *Allmänna reklamationsnämnden*).

Internal follow-up and reporting procedures

The Complaints Officer shall inform the Compliance Function of all submitted complaints and how these have been managed, with the aim of facilitating preventive measures and information initiatives. Internal reporting procedures for providing information to the institution's board of directors or senior management regarding complaints should be established.

The Complaints Officer and the CEO shall jointly decide whether external parties (such as outsourcing partners) shall be informed of the complaint.

Client information

The Complaints Officer shall ensure that, in its interactions with the Company, the client is appropriately informed of how to submit a complaint to the Company, how a matter may be escalated in the event of an adverse decision. In connection with this, the client shall also be informed of the available options to refer the matter to public authorities or any other relevant external bodies.

Disclosure made by the Company

The Company shall ensure that information is publicly disclosed on how a client may submit a complaint against the Company and on the procedures to be followed in handling a complaint. Such information shall include the Company's principles for complaints handling, the identity of the Company's Complaints Officer, and contact details for the complaints handling function. The Company shall also disclose information regarding guidance available from the Swedish Consumers' Banking and Finance Bureau, and through local municipal consumer advisory services.

Routines and working instructions

Complaints shall be handled and processed in accordance with Coeli Asset Management AB's Instruction: *Instruktion för klagomålshantering*.

Register and documentation of client complaints

The Complaints Officer shall ensure that each complaint received is recorded in a central register in chronological order and that the cases are documented in such a manner that the handling of each case can be traced retrospectively. Such documentation shall be retained for a minimum period of five years.

Complaints shall be registered and documented in accordance with Coeli Asset Management AB's template: *Mall för journal kundklagomål*.

Documentation of completed Reviews of the Policy

Date of Review	Policy Version nr	Reason for Review	Description of changes of the Policy that the review led to	Examined by		
				CEO	CCO	CRO
2025-11-03		Årlig genomgång av Klagomålsansvarige	Genomgående förbättring av språk och disposition; olika avsnitt har slagits samman respektive brutits isär. Införande av instruktion som i mer detalj redogör för hur klagomål ska handläggas. Införande av mall för journalföring av klagomål.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>