



Family Ace

INVESTIČNÍ SPOLEČNOST

Complaints policy

VP06 Complaints handling guide (Complaints policy)

1. Introductory provisions

- 1.1. Unless otherwise stated, the meaning of the terms used in this VP are as defined in VP00 System of Internal Standards.
- 1.2. The Company is obliged to act with all professional care in fulfilling its obligations arising from generally binding applicable regulations, or from a contract or documentation analogous to a contract concluded with the Investor (hereinafter referred to as the 'Contract'), under the conditions set out in the Contract and in generally binding applicable regulations.
- 1.3. If the Company entrusts another person with the handling of investor claims and complaints in relation to a certain Fund, the procedures for handling the claims and complaints filed by investors in such Funds shall be governed by the complaints policy of this authorised person.
- 1.4. A complaint is understood as a notification of a deficiency, improper conduct or inaction of the Company or its Employee towards the Investor. A claim is an expression of dissatisfaction with the quality of the Company's fulfilment of contractual terms and conditions arising under the Contract. The procedure for handling both claims and complaints from Investors is analogous.
- 1.5. An Investor who believes that the Company has not acted in accordance with paragraph 1.2 of this VP has the right to file a claim or complaint in accordance with this VP and generally binding applicable regulations. The legal condition for filing a claim or complaint is a duly concluded Contract.
- 1.6. A settlement of claims arising from the complaint or claim, and the performance of necessary accounting operations related to the complaint or claim.
- 1.7. The handling of complaints and claims is always free of charge.

2. Filing a complaint

- 2.1. If a defect is discovered, the Investor shall file a complaint:
 - with the Company, or the person authorised by the Company to handle investor claims and complaints, specified in the KID;
 - in writing, whereby an email signed with a certified digital signature shall also be considered a written submission;
 - within the period specified in Art. 3.1 of this VP.
- 2.2. The complaint filed by the Investor must contain data and documents on the basis of which the Company can investigate the justification of the complaint and decide whether the complaint is justified, particularly including:
 - the Investor's first and last name/business name and contact person;
 - the Investor's place of residence, or another contact address;
 - the Investor's date of birth/CRN;
 - the reason for the complaint;
 - a list of annexes, as well as all annexes confirming the legitimacy of the complaint;
 - date and handwritten signature, or certified digital signature.

- 2.3. If the complaint does not contain data and documents that allow investigation of the complaint's justification, the Company will invite the Investor to provide them. If the Investor does not provide the required information or documents within the specified period (not less than 7 days), the Company will reject the complaint as unjustified.
3. Complaint time limit
 - 3.1. Investors must file a complaint without undue delay upon discovery of deficiencies or inaccuracies, but no later than 3 months from the occurrence of the deficiency or inaccuracy, unless the time limit for complaints is defined differently in the Contract.
 - 3.2. The Company is obliged to take a position on the complaint or claim and handle it, i.e. notify the Investor whether it acknowledges the complaint or claim, or for what reasons it rejects it; it must also send the Investor a written statement within 30 days from the receipt of the claim, or from the date of its completion pursuant to paragraph 2.3 of this VP.
 - 3.3. If the Company cannot resolve the complaint or claim within 30 days for objective reasons, it must inform the Investor of the reason for this and, if applicable, how it will resolve the claim, including a new date for its resolution. The company proceeds in accordance with the following provisions of this VP.
 4. Handling complaints
 - 4.1. The person responsible for the proper handling of a complaint sent by the Investor to the Company, including monitoring its progress, is the Compliance Officer. If the claim or complaint concerns the compliance department, it is handled by a member of the Company's board of directors, or a person authorised by him to handle the claim or complaint.
 - 4.2. In the event of a complaint delivered to the Company by post, the complaint is accepted by the Company's office. In the case of personal delivery, the asset management director accepts the complaint. The person who accepts the complaint will discuss it with the Investor and record the course of the discussion in the 'Investor's Complaint/Claim' form, which is Annex 2 to this VP; if it is delivered personally, it is signed by the Investor and the Employee who accepted it in two copies, one of which is given to the Investor. If it is delivered in writing, the form is filled out by the Employee to whom the complaint was delivered and attached to the documents from the Investor.
 - 4.3. The person receiving the complaint informs the Compliance Officer, as the person responsible for proper and complete handling of complaints and the issuance of documents for handling the complaint, and hands over all supporting documents and documents related to the handling of a specific complaint. Each claim or complaint received from the Investor is recorded by the Compliance Officer in the relevant records. Employees involved in handling the complaint cooperate with the Compliance Officer as necessary for keeping the relevant records.
 - 4.4. All documents related to the handling of a specific complaint are kept by the Company for at least 5 years, unless generally binding applicable regulations stipulate a longer period.
 - 4.5. The Compliance Officer and the Internal Auditor have access to the register of Investors' complaints and claims. In connection with complaints filed against the Company's activities and the results of their resolution, the Compliance Officer is obliged to coordinate the creation of corrective measures and check the compliance of the proposed measures with applicable regulations.
 5. Rejection of a complaint
 - 5.1. A complaint will be rejected if the investigation reveals that the complaint is unfounded, that the details provided are incorrect and there is credible evidence supporting the rejection of the complaint.

6. Acceptance of a complaint

- 6.1. If a complaint or claim is accepted by the Company, the Compliance Officer will designate a specific Employee to handle the claim with the Investor, whose name will subsequently be told to the Investor. The subject of the complaint shall be rectified without undue delay.
- 6.2. The Investor must cooperate with the Company as necessary to resolve the complaint.
- 6.3. The person whose work the complaint concerns shall prepare a written response and shall consult his superior on the proposed solution to the claim or complaint. After approval, the response will be forwarded to the Compliance Officer for archiving.
- 6.4. In the event of a complaint against an Employee authorised to handle the complaint, the Investor shall negotiate directly with the Compliance Officer, who will handle the complaint personally.

7. Changes to the Complaints Policy

- 7.1. The Complaints Policy regulates the rules that Employees follow in handling complaints and claims, and it forms Annex 1 of this VP.
- 7.2. In the event of a change to the Company's Complaints Policy, the Company is obliged to notify Investors of the change in writing in a timely manner, and each change to the Complaints Policy must be published at the Company's registered office and on the Company's website. The method of notifying the Investor of the updated Complaints Policy, as well as the qualified method for the Investor to consent to the changes, is appropriately governed by the relevant provisions of the Contract.

8. Final provisions

- 8.1. The Company, and all its Employees, are obliged to comply with the rules set out in the internal standards issued by the Company pursuant to the provisions of the ZISIF and the generally binding applicable regulations implementing the ZISIF in their activities consisting of managing investment funds pursuant to Section 5 of the ZISIF. The rules apply to all Workers, i.e. both employees of the Company in an employment relationship and on the basis of agreements on work performed outside of an employment relationship, and persons, including their employees, performing work for the Company on the basis of another contractual arrangement, within the framework of outsourcing pursuant to Section 23 et seq. and Section 52 et seq. of the ZISIF, etc.
- 8.2. The VP is kept at the Company's registered office and is subject to updating based on the Company's needs and in connection with changes in generally binding applicable regulations.

Complaints Policy

1. This Complaints Policy specifies the rules and procedures for the free handling of complaints and claims by fund shareholders or unitholders for whom AVANT investiční společnost, a.s. (hereinafter the 'Company') provides administration services (hereinafter an 'Investor').
2. The legal basis for filing a complaint or claim is a duly concluded contract or contractual documentation analogous to the contract on the basis of which the Company provides services for the Investor (hereinafter referred to as the 'Contract').
3. The investor must submit a complaint or claim in writing, whereas an email signed with a certified digital signature is also valid.

4. Investor must file a complaint without undue delay upon discovery of deficiencies or inaccuracies, but no later than 3 months from the occurrence of the deficiency or inaccuracy, unless the time limit for complaints is defined differently in the Contract.
5. The complaint filed by the Investor must contain data and documents on the basis of which the Company can investigate the justification of the complaint and decide whether the complaint is justified, particularly including:
 - the Investor's first and last name/business name and contact person;
 - the Investor's place of residence, or another contact address;
 - the Investor's date of birth/CRN;
 - the reason for the complaint;
 - a list of annexes, as well as all annexes confirming the legitimacy of the complaint;
 - date and handwritten signature, or certified digital signature.
6. If the complaint does not contain data and documents that allow investigation of the complaint's justification, the Company will invite the Investor to provide them. If the Investor does not provide the required information or documents within the specified period (not less than 7 days), the Company will reject the complaint as unjustified.
7. The Company is obliged to take a position on the complaint or claim and handle it, i.e. notify the Investor whether it acknowledges the complaint or claim, or for what reasons it rejects it; it must also send the Investor a written statement within 30 days from the receipt of the claim, or from the date of its completion pursuant to the previous point. If the Company cannot resolve the complaint or claim within 30 days for objective reasons, it must inform the Investor of the reason for this, and how it will resolve the claim, including setting a new date for its resolution.
8. The Investor must cooperate with the Company as necessary to resolve the complaint.
9. The Company shall handle the complaint or claim by accepting or rejecting it, of which it shall send a written notification to the Investor.
10. A complaint or claim will be rejected by the Company if, upon investigation, the Company finds that the complaint is unfounded, or the claimed data is incorrect and there is credible evidence supporting this conclusion.
11. If the complaint or claim is accepted by the Company, the claimed condition shall be remedied without undue delay, and the Investor shall be informed of the name of the Company employee who will handle the claim with him.
12. In the event of a complaint against a Company employee authorised to handle the complaint, the Compliance Officer, as the person responsible for proper and complete handling of complaints and the issuance of documents for handling the complaint, will discuss the handling of the complaint with the Investor personally.