

## **COMPLAINT HANDLING POLICY FOR CLIENTS OF MANAGEMENT COMPANY "KAROLL CAPITAL MANAGEMENT" EAD**

### **I. General Provisions**

This complaint handling policy of the Management Company "Karoll Capital Management" EAD (MC) has been developed and adopted pursuant to Article 118, paragraph 1 of Ordinance No. 44 on the requirements for the activities of collective investment schemes, management companies, national investment funds, and persons managing alternative investment funds (Ordinance No. 44).

The main principles of this policy are that the complaints of clients of MC "Karoll Capital Management" EAD should be resolved clearly, fairly, and impartially, within the pre-established response deadlines. The resolution of disputes aims for speed, objectivity, and independence in decision-making and drafting responses, preventing litigation, preserving the good name of the Management Company, and analyzing and eliminating the causes of client dissatisfaction.

### **II. Complaint Handling**

MC "Karoll Capital Management" EAD establishes and maintains an organization for handling submitted complaints, ensuring that each case is reviewed quickly, fairly, and impartially, and guaranteeing the identification and avoidance of conflicts of interest.

MC "Karoll Capital Management" EAD documents each submitted complaint, reviews it, and responds within the established timeframe. Complaints are reviewed by an employee from the "Regulatory Compliance" department of the Management Company, with the assistance of an employee performing the relevant service. To avoid potential conflicts of interest, the employee against whom the complaint is made does not participate in the review and resolution process.

The registration of received complaints on the day of their receipt, as well as the maintenance of a special log in accordance with regulatory requirements, is carried out by an employee of the Regulatory Compliance department of the Management Company.

### **III. Method of Submission and Review of Complaints**

Under the meaning of this policy and in accordance with § 1, item 20 of the additional provisions of Ordinance No. 44 of 20.10.2011 on the requirements for the activities of collective investment schemes, management companies, national investment funds, and persons managing alternative investment funds (Ordinance No. 44), a "Complaint" is a grievance by a person regarding an investment service provided or portfolio management by a management company or a person managing alternative investment funds.

Any person who believes that their rights have been violated in connection with an investment service provided or portfolio management (investor) has the right to submit a complaint to MC "Karoll Capital Management" EAD without paying a fee.

Complaints can be submitted in the following ways:

1. Customer complaints sent to the official email of "Karoll Capital Management" EAD – kcm@karoll.bg
2. Written complaints submitted to the address of the company's headquarters: 1 Zlatovrah Str., Sofia 1164;
3. Written complaints from customers forwarded to "Karoll Capital Management" EAD through supervisory or other administrative and state bodies (Financial Supervision Commission, Consumer Protection Commission, Personal Data Protection Commission, Commission for Protection of Competition, etc.).

On the day of receipt at the Company, complaints are forwarded to the "Regulatory Compliance" department and recorded in a special complaints log in compliance with the requirements of Ordinance No. 44 and other applicable regulations. The log is maintained by the head of the Regulatory Compliance department.

### **IV. Form of the Complaint and Information Provided by the Complainant**

The complaint is in free text, but to facilitate faster processing, it should have minimal content:

- Identification of the complainant - full name, PIN or UIC, ID document number.

- Correspondence address and contact phone number.
- Description of the grievance and the complainant's request.
- Attached documents relevant to the case.
- Signature of the person or their legal representative/authorized person, if the complaint is submitted in paper form.
- The complaint is submitted in Bulgarian or in a foreign language accompanied by a translation.
- Anonymous complaints are not considered.

## **V. Review of Complaints**

MC "Karoll Capital Management" EAD takes all necessary measures to process received complaints from investors, with employees from the "Regulatory Compliance" department collecting and investigating all relevant evidence and information on the case.

Based on the collected evidence and information on the complaint, it is assessed whether the information contained in the complaint is sufficient to prepare a reasoned opinion on the case. If necessary, additional information is requested from the client, and the complainant and the Financial Supervision Commission (FSC) are notified of the reasons for the delay.

Correspondence is conducted in a clear and understandable language for both parties.

## **VI. Deadlines for Resolving Received Complaints from Clients**

MC "Karoll Capital Management" EAD prepares and provides responses to received complaints as soon as possible, but no later than 7 (seven) working days from the date of receipt of the complaint. In case it is not possible to provide a response within the above-mentioned period due to factual or legal complexity of the case, or if additional evidence needs to be collected, the complainant is immediately notified of the reasons for the delay, indicating when the review is expected to be completed and a response to the complaint provided.

The response to the complainant contains the reasoning for the position of "Karoll Capital Management" EAD regarding the grievances in the complaint, information on the possibility of filing complaints with the FSC and other state bodies, as well as the forms of out-of-court dispute resolution available to the investor in the Republic of Bulgaria.

## **VII. Internal Follow-up Actions Regarding Complaint Handling**

MC "Karoll Capital Management" EAD analyzes received complaints and takes measures to eliminate weaknesses in its activities identified based on the complaints, at least continuously analyzing information on complaint handling to identify and overcome recurring or systemic problems.

To ensure publicity of the possibility of submitting and the process of handling complaints, MC "Karoll Capital Management" EAD publishes this policy on its website.

This Policy is adopted by the Board of Directors of MC "Karoll Capital Management" EAD and supersedes all previous versions.

This Policy was adopted by the Board of Directors of MC "Karoll Capital Management" EAD on 22.11.2017 and amended on 09.06.2020.

**Executive Director:.....**

**Procurator:...**