



**THE GRIEVANCE POLICY  
FOR HANDLING COMPLAINTS AND CLAIMS**

Version as of: May 1, 2024

## 1. INTRODUCTORY PROVISIONS

Dragon Capital (further "The Company") hereby determines the Grievance policy for handling complaints and claims including the registration of the complaint and the involvement of the appropriate parties.

Dragon Capital strives to act in the best interest of its clients and stakeholders by aiming to meet the highest standards when conducting business. These standards are defined in law and regulations, the Code of Conduct and various policies and procedures.

Every client or stakeholder is entitled to submit a complaint concerning the activities of the Company in relation to provision of investment services.

For purposes of this policy and consistent with regulatory standards, a client or stakeholder **complaint** is defined as:

Communications (oral, e-mail, fax, letter) expressing dissatisfaction in connection with activity, financial transaction, service, or product involving the Company and relating to the conduct of the any Company of Dragon Capital or its personnel.

## 2. COMPLAINT HANDLING PROCEDURE

### Method of submitting a Complaint:

- Via the client's relationship manager (in accordance with information on Dragon Capital web-site)
- Via e-mail: [grievance@dragon-capital.com](mailto:grievance@dragon-capital.com)

### Complaint Acknowledgement

Dragon Capital will seek to acknowledge receipt within 48 hours of receipt.

Dragon Capital is entitled to ask the person making the complaint (further "the person") to provide additional information, if it finds the Complaint incomplete. The person is required to provide the appropriate cooperation.

### Internal Complaint process

Dragon Capital will log complaints into the relevant internal complaint system.

Dragon Capital will investigate the complaint competently, diligently and impartially and assess the subject matter of the complaint fairly, consistently and promptly, as well as what remedial action may be appropriate.

In response to a complaint, the Company offers corrective actions or rejects the complaint with reasons.

### Time limits for resolving the Complaint

The maximum time limit for resolving the Complaint is **30** calendar days from acknowledgement of the Complaint.

If the Complaint cannot be resolved within this time limit, the person is informed before the expiration of this period about the reasons for the extension and the estimated time limit within which the Complaint will be handled.

### **3. POSSIBILITY OF APPEAL**

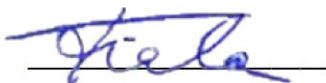
If the person is not satisfied with the resolution of the Complaint, the person can submit a repeated complaint and state the argumentative reasons for disagreement with the handling of the original complaint.

The repeated complaint is considered in the general procedure. If the repeated complaint does not indicate argumentative reasons for disagreement with the resolution of the initial complaint, then such repeated complaint remains without consideration.

### **4. FINAL PROVISIONS**

The Grievance Policy is a public document and is published on the Dragon Capital website.

*I, Tomas Fiala, affirming our vision for the gold standard of doing business, approve this Policy for use in the Dragon Capital group of companies.*



**Tomas Fiala**