

# JERA CAPITAL

## Complaints handling procedure



Version as of 1 November 2024

Strictly private and confidential

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## 1. Background and purpose

- 1.1 Jera Capital A/S (“Jera Capital”) is an alternative investment fund manager (“AIFM”) based in Copenhagen. Jera Capital manages alternative investment funds investing in the private markets. The business objective of Jera Capital is to manage alternative investment funds offering diversified exposure to private markets mainly through open-ended fund structures.
- 1.2 This procedure for complaints handling (the “Procedure”) is adopted to ensure that Jera Capital is compliant with the regulation on the AIFM’s handling of complaints and appointment of a complaint responsible.
- 1.3 The Procedure sets out the processes which Jera Capital has established for its handling of Complaints (as defined below) covered by the scope of this Procedure, including roles and responsibilities.

## 2. Definitions

- 2.1 Unless the context requires otherwise, the following definitions shall have the meanings ascribed thereto:

|  |   |
|--|---|
| <b>“AIF”</b>                           | means an alternative investment fund managed by Jera Capital;   |
| <b>“Board of Directors”</b>            | means the board of directors of Jera Capital, as registered with the Danish Business Authority from time-to-time;   |
| <b>“Board of Management”</b>           | means the board of management of Jera Capital as appointed as registered with the Danish Business Authority from time-to-time;  |
| <b>“Complaint”</b>                     | means a statement of dissatisfaction addressed to Jera Capital by a Complainant in relation to (i) the Complainant’s retail customer relationship or (ii) commercial matters that do not deviate significantly from the Complainant’s retail customer relationship; |
| <b>“Complainant”</b>                   | means a natural or legal person who is presumed to be eligible to make a Complaint through having a retail customer relationship with Jera Capital;   |
| <b>“Complaints Responsible Person”</b> | means the person appointed by the Board of Management to handle Complaints in accordance with this Procedure;   |
| <b>“Compliance Officer”</b>            | means the compliance officer of Jera Capital appointed by the Board of Directors pursuant to the compliance policy;   |
| <b>“Danish FSA”</b>                    | means the Danish Financial Supervisory Authority; and   |
| <b>“Jera Capital”</b>                  | means Jera Capital A/S;   |

### 3. Scope

- 3.1 This Procedure only applies to Complaints concerning Jera Capital's retail customer relationships as set out in Executive Order no. 1219 of 20 November 2019 on the complaint responsible and financial institution's handling of complaints, section 1(2) (the "Executive Order"), to the extent this apply to Jera Capital.
- 3.2 This includes, without limitation, any requirement for Jera Capital to provide key information documents regarding units in AIFs which constitute a packaged retail investment product (PRIIP) in accordance with the Regulation 1286/2014 of 26 November 2014 on key information documents for packaged retail and insurance-based investment products (the "PRIIPs Regulation").
- 3.3 Jera Capital does not offer publicly available units in AIFs and as such its only potential retail customer relationships relate to privately solicited units in AIFs. Furthermore, Jera Capital only offers units in AIFs to professional investors (as defined in MiFID II) and to semi-professional investors (in accordance with section 5(5) in the AIFM Act), i.e. Jera Capital will only have retail customer relationships where it offer units in AIFs to semi-professional investors, who is regarded as retail customers in the sense of this Procedure.

### 4. Division of responsibilities

- 4.1 The Board of Management is overall responsible for the adequate implementation and monitoring of Jera Capital's compliance with this Procedure.
- 4.2 The Board of Management has appointed the Compliance Officer as the person responsible for Jera Capital's handling of Complaints (the "Complaints Responsible Person"). The Complaints Responsible Person is responsible for ensuring a fair investigation of all Complaints and that all potential conflicts of interest in connection herewith are identified and mitigated.

### 5. Handling and responding to Complaints

- 5.1 The Complaints Responsible Person shall handle all Complaints:
- (a) specifically addressed to the Complaints Responsible Person; and
  - (b) where it has not been possible for another department within Jera receiving a complaint to settle the relevant issue.
- 5.2 The Complaints Responsible Person (or any person to which the Complaints Responsible Person has delegated its duties to in its absence) shall confirm receipt of a Complaint to the Complainant within 3 Business Days. Jera Capital shall in connection with acknowledging its receipt of a Complaint provide the Complainant with information regarding the expected process for Jera Capital's handling of the Complaint.
- 5.3 The Complaints Responsible Person shall provide a final decision to Complainants without any

unnecessary delay and within a reasonable time. When an answer cannot be provided to a Complainant within a commercially reasonable time limit, the Complaints Responsible Person shall inform the Complainant about when Jera Capital's investigation of the matter is likely to be completed.

- 5.4 When the Complaints Responsible Person provides a final decision in terms of a Complaint, the Complaints Responsible Person shall provide the Complainant with a thorough explanation of Jera Capital's position on the Complaint and set out the Complainant's option to maintain the complaint by e.g. the availability of contacting the Danish FSA.

## 6. Information to clients on process for handling Complaints

- 6.1 Jera Capital shall, on request, or when acknowledging its receipt of a Complaint, provide written information regarding its complaints-handling process. Jera Capital shall publish details on its complaints-handling process in an easily accessible format on its website <https://www.jera-capital.com> providing clear and accurate information on Jera Capital's complaints-handling process, including details on how to complain and to whom (the Complaints Responsible Person).

## 7. Registration of Complaints and follow-up on complaints handling

- 7.1 The Complaints Responsible Person shall register all received Complaints in a list in accordance with Schedule 7.1 (corresponding to Annex IV to the Danish FSA's guidelines to the Executive Order). Such registrations shall include a specification of the scope, status and outcome of any Complaint.
- 7.2 The Complaints Responsible Person shall, on an ongoing basis, analyze the data regarding Jera Capital's handling of Complaints with the aim of ensuring that Jera Capital identifies and addresses any recurring or systemic problems, including potential legal and/or operational risks which have given rise to Complaints.

## 8. Reporting to the Danish FSA

- 8.1 Jera Capital shall, upon request from the Danish FSA, report any necessary information concerning Complaints to the Danish FSA.

## 9. Review and approval

- 9.1 This Procedure shall be reviewed at least once a year by the Complaints Responsible Person.

9.2 This Procedure was approved by the Board of Management on 1 November 2024.

Approval history:

| Version: | Effective from: | Changes:      | Approved by:        |
|----------|-----------------|---------------|---------------------|
| 1        | 1 November 2024 | First version | Board of Management |

## 10. Schedule 7.1 - Form for registration of complaints

| Alternative investment fund managers |                                   |                        |                        |                        |
|--------------------------------------|-----------------------------------|------------------------|------------------------|------------------------|
|                                      | No. complaints received in [year] | Partially accepted     | Accepted in full       | Denied                 |
| Investment                           |                                   | [Scope/status/outcome] | [Scope/status/outcome] | [Scope/status/outcome] |
| Marketing                            |                                   |                        |                        |                        |
| Governance                           |                                   |                        |                        |                        |
| Costs etc.                           |                                   |                        |                        |                        |
| Other                                |                                   |                        |                        |                        |
| Total no. of complaints              |                                   |                        |                        |                        |