

COMPLAINTS POLICY

Date approval:	17 January 2020
Approved by:	Statutory Board
Owner:	Compliance
Regarding process:	Compliance Monitoring, Compliance Reporting
Scope:	Funds & Mandates

Objective

This Complaints Policy details the complaints handling infrastructure with an effective and transparent complaints management process for the prompt handling of Clients' or potential Clients' complaints.

Scope

The Complaints Policy is primarily focused on complaints from (potential) Investors – i.e. Investors in Triple Jump-managed AIFs and/or investors who have entrusted TJ with a Mandate. The secondary focus of the Policy is on Complaints from Investees. Complaints from staff are dealt with in the HR policy. This policy has an impact on the Compliance monitoring and reporting process, as Compliance has oversight of the complaints process, and considers complaints to be a source of information for its monitoring responsibilities. Being the first point of contact for clients, the Investor Relations & Business Development (IRBD) team's account management process is also affected, as they flag Complaints when they occur.

Regulatory requirements

MiFID II: article 16(2)

Delegated Regulation MiFID II (2017/565): articles 22(2), 26

Definitions and terms

AIF	Alternative Investment Fund; defined in the AIFMD as collective investment undertakings, including investment compartments which: 1) raise capital from a number of investors, with a view to investing it in accordance with a defined investment policy for the benefit of those investors; and 2) do not require authorisation pursuant to article 5 of Directive 2009/65/EC (UCITS Directive).
Client	The investors in a TJ managed AIF and contracted clients with an advised or managed Mandate.
Complaint	Any report (via an official channel of Triple Jump such as Twitter, internet, email, telephone, written letter, meetings) from a Client or Investee, which indicates that their expectations were not met and which is not a misunderstanding or lack of information that can quickly be resolved quickly and which clearly – in view of the Complainant's disappointment – merits attention at a high level within the Triple Jump organisation.
Complainant	The Client or Investee who submits a complaint and/or their representative.
Investee	An FI or MFI to which a Fund lends money (debt) or invests in (equity)
Mandate	Contractual agreement between Triple Jump and a Professional Client to manage a portfolio of Investment Products on a discretionary client-by-client basis.

Policy specifics

1. Complaint handling

A Complaint is dealt with by the complaints manager. The complaints manager is not involved in the action to which the complaint relates. Triple Jump's Senior Management has designated the Compliance Officer as the complaints manager. In case the Client's complaint relates to the Compliance Officer, the Triple Jump General Counsel will be the person responsible for the complaint handling. The General Counsel will monitor the complaint handling process as performed by the complaints manager.

2. Making a complaint

Complaints can be made to Triple Jump, in writing or via electronic communication. Complaints made by telephone or in a meeting must be confirmed in writing/by email. A Complainant can submit the Complaint directly to the complaints manager or to any other Triple Jump staff member. The Complainant can submit complaints free of charge. If the Complaint is submitted to a Triple Jump's staff member who is not the complaints manager, the staff member who receives the Complaint will pass the complaint on to the complaints manager within 24 hours.

- 2.1. A complaint made in writing or via electronic communication must be signed and should contain at least:
 - a. the name and the address of the Complainant;
 - b. the date;
 - c. a description of the event to which the Complaint relates.
- 2.2. The description referred to in subsection c above must be sufficient, in the opinion of the person responsible for complaints, to enable them to consider the complaint properly.
- 2.3. Triple Jump has the right not to consider a Complaint that has not been submitted in accordance with the requirements set out in this article , even after repeated requests to the complainant to do so.

3. Handling of the complaint

- 3.1. Triple Jump will ensure that any communication, notification or correspondence regarding a Complaint made by a Client, is made in writing or via electronic communication in plain language that is easy to understand.
- 3.2. In its first communication, Triple Jump will inform the Complainant of the applicable Complaints Policy and provide the contact details of the complaints manager.
- 3.3. Triple Jump is not required to consider the Complaint if the Complaint relates to an action that took place more than one year prior to the submission of the Complaint. Triple Jump will notify the Complainant that the complaint will not be considered as soon as possible, but no later than within four weeks of receipt of the Complaint.
- 3.4. If the Complaint relates to the action of a person, the person responsible for complaints can inform this person about the receipt of the Complaint. If the Complainant does not wish their identity want to be disclosed to this person, the Complainant must notify the complaints manager of this. The complaints manager can disregard this objection on the Complainant's part if the complaints manager believes that this is necessary for the proper handling of the Complaint.
- 3.5. If the Complaint is to be investigated, the complaints manager will confirm this in writing to the Complainant. In this written communication, Triple Jump will mention the term in which the Complaint will be dealt with.
- 3.6. Simple Complaints will be dealt with within six weeks of the Complaint being made by the Complainant. Complex complaints will be dealt with within three months of the

submission of the Complaint. In their communications, the complaints manager will inform the Complainant whether the Complaint is classified as a simple or complex Complaint and how long the corresponding period will be to deal with the Complaint.

- 3.7. If it is found that the time frame specified in article 3.5 cannot be met, the Complainant will be informed of this in writing before the end of that period. This communication must set out the reason for the delay and the period within which the Complainant will receive a response.
- 3.8. The complaints manager:
- will study the file to which the Complaint relates and will gather all other relevant information;
 - may obtain additional information from the Complainant;
 - will assess the file and additional information obtained and compares these with the arguments made by the Complainant;
 - can discuss the file with a Senior Manager or EB member as a check on their own interpretation;
 - will form an opinion and record their findings and reasoning in the complaint file;
 - will monitor the complaints-handling process and consider the Complaint as a source of relevant information in the context of their responsibility for compliance monitoring.
- 3.9. In case of complaints from Investors, the complaints manager will form a Resolution Team together with at least IRBD to identify the cause of the Complaint and find a solution for the Complaint. The Executive Board will be informed about these Complaints from Investors and asked to provide advice on the proposed solution.

4. Resolution of the complaint

- 4.1. The complaints manager will inform the Complainant in writing about Triple Jump's position, as well as the reasoning for the position taken by Triple Jump with regard to the Complaint.
- 4.2. If the Complainant disagrees in part or in full with the position taken by the complaints manager on behalf of Triple Jump, the Complainant can notify the complaints manager of their reasoning.
- 4.3. If the exchange of views following the Complainant's response cannot be concluded to the satisfaction of the Complainant or the compliance manager and the parties continue to disagree, the compliance manager will inform the Complainant of the option to initiate proceedings in a civil court.

5. Management of the complaint

- 5.1. The complaints manager must ensure that at least the following information is included in a Complainant's complaint file:
- a. the Complainant's name and address details;
 - b. date on which the Complaint was made;
 - c. name of the complaints manager;
 - d. description of the Complaint;
 - e. when and manner how the complaint was resolved;
 - f. correspondence conducted with regard to the Complaint; and
 - g. status of the Complaint (in progress/resolved).
- 5.2. Complaint files will be kept for at least one year after the Complaint has been resolved by the person responsible for complaints on behalf of Triple Jump.
- 5.3. All Complaints (made, processed and resolved) will be recorded centrally by the complaints manager in Triple Jump's Complaints Register.

6. Reporting to the AFM

Triple Jump will inform the Netherlands Authority for the Financial Markets (AFM) of the Complaints received from any investor (Mandates and participants in AIFs) and any related complaints-handling data in its annual questionnaire 'Marktmonitor banken en beleggingsondernemingen' (Market monitor banks and investment institutions).

Process requirements

Process
Investor Complaints Handling Company Regulations

Review of Policy

This Complaints Policy will be reviewed by the Compliance Officer on an annual basis. The review report will be submitted to the Executive Board for their approval.

Address for complaints

The following address can be used to submit a Complaint in writing:

Triple Jump B.V.
For the attention of the Compliance Officer
Mensinghe 78
1083 HG Amsterdam, The Netherlands
complaints@triplejump.eu

Annexes

None