COMPLAINTS MANAGEMENT POLICY and PROCEDURE

Date approval:	19 January 2026
Approved by:	Management Board
Owner:	Compliance
Scope:	Funds & Mandates

1. Objective

Triple Jump is committed to consistently offering the best possible services to its existing and prospective Clients and Investees. Nevertheless, it recognises that sometimes Clients might not be satisfied with the service they have (or not) received. In order to efficiently and effectively address the circumstances in which expectations on the level of the service provided are not met, Triple Jump has established and implemented this Complaints Management Policy and Procedure (**this Policy**). It details Triple Jump's approach to Complaints management and provides clear, accurate, and up-to-date information on how Complaints are handled. In line with regulatory requirements, this Policy is made public on the Triple Jump's website and contains the contact details of the Complaints management function.

2. Scope

This Policy is primarily focused on the management of complaints from Clients (existing and potential) – i.e., Investors in Triple Jump-managed Alternative Investment Funds (AIFs) and/or Investors who have entrusted Triple Jump with an advised or managed Mandate. On a voluntary basis, Triple Jump has decided that expressions of dissatisfaction from Investees are also handled in accordance with the procedure described in this Policy. Complaints from Staff are outside the scope of this Policy and are addressed in the Triple Jump Navigator.

The implementation of this Policy primarily applies to the Investor Relations & Business Development (**IRBD**) Team and the Investment Teams (for Investees). It is also relevant for the Compliance department as it is subject to monitoring as part of the Compliance Monitoring Programme, and to reporting to the AFM.

Complaints received in relation to the application of the ESG Regulations are typically handled in line with the ESG Grievance Policies (depending on the relevant mandate).

3. Regulatory requirements and guidelines

Directive 2014/65/EU (MiFID II): article 16(2)
Delegated Regulation MiFID II (2017/565): articles 22(2), 26
Financial Supervision Act (Wet op het financieel toezicht **or** Wft): Section 4.17
EBA Final Report on Guidelines on complaint handling (July 2024)

4. Definitions and terms

AFM	The Netherlands Authority for the Financial Markets
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 do not require authorisation pursuant to article 5 of Directive 2009/65/EC (UCITS Directive).
Client	The investors in a Triple Jump managed AIF and contracted Clients with an advised or managed Mandate.

Complainant	A natural or legal person who is presumed to be eligible to have a Complaint considered by Triple Jump under the provision of this Policy. For the purpose of this Policy, a Complainant is an existing or perspective Investor and/or their representatives. On a voluntary basis, also Investees are considered Complainants.
Complaint	A statement of dissatisfaction, whether in writing or verbally addressed to Triple Jump by a natural or legal person relating to the provision (or failure to provide) of an investment service under MiFID or the AIFMD.
Investee	Any party which a Triple Jump Mandate or Fund lends money to (debt) or invests in (equity).
IRBD	The Investor Relations & Business Development department at Triple Jump
Mandate	Contractual agreement between Triple Jump and a Professional Client to manage a portfolio of investment products on a discretionary client-by-client basis.
Staff	All Triple Jump employees with a fixed term or indefinite contract as well as temporary workers and freelancers.

5. Policy specifics

5.1 Roles and responsibilities

The **Management Board** (the **Board)** is primarily responsible for establishing and maintaining an effective and transparent Complaints management policy and procedure for the prompt handling of Complaints. The Board is also responsible for establishing a Complaints management function to oversee the investigation of Complaints. In line with the principle of proportionality, the Board has decided that this function can be carried out by the Compliance Manager.

The **Compliance Manager** is responsible for implementing this Policy and monitoring its day-to-day effectiveness. This also includes providing information on Complaints to the AFM upon request. The Compliance Manager is also responsible for analysing Complaints related data, to ensure that any risks or issues are identified promptly and addressed appropriately (e.g., root-cause analysis).

All Members of Staff involved in the Complaint handling process are responsible for familiarizing themselves with the provisions of this Policy and for ensuring a fair and professional treatment of Complainants when dealing with their dissatisfaction.

5.2 Triple Jump Principles

As a firm regulated by the Netherlands Authority for the Financial Markets (**AFM**), Triple Jump has established the following principles for handling and managing Complaints from eligible Complainants.

- Triple Jump is committed to offer the best possible service to its Clients and to do business fairly and ethically;
- Triple Jump handles Complaints openly and with transparency, being cognizant that a Complaint is also an opportunity to review business practices and improve the services offered;
- Eligible Complaints are handled effectively and in an independent manner by the Compliance Manager. This is also to avoid conflicts of interest between the business line and the Complainant;
- The Board ensures that, in order to discharge its responsibilities properly and independently, the Compliance Manager has the necessary authority, resources and access to all relevant information;

- The background of each Complaint is analysed so to identify root causes common to the nature of the Complaint. This analysis also considers whether such root causes may also affect other processes (even those not directly linked to the Complaint).

6. Complaint Handling Procedure

Complaints may be submitted to Triple Jump, verbally (during a telephone conversation or a meeting), 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, free of charge, directly to the Compliance Manager or to any other Triple Jump Staff member.

A Complaint is typically received by the member of Staff who liaises with a Client (e.g., the contact person for the Complainant) or an Investee. Unless the Complaint relates to the conduct of that member of Staff, then an initial review of the case takes place. All Complaints are handled diligently, impartially, fairly, consistently, and promptly, by the member of Staff in charge of it. Members of Staff will make efforts to address the dissatisfaction and find an optimal and fair resolution, which is communicated to the Complainant in writing. If the Complaint is received by any other member of Staff, the case is then forwarded to the right department or to Compliance.

If a resolution of the issue is not possible at an early stage, and/or the Complainant remains dissatisfied with the way the matter was initially addressed, then the case is forwarded to the Compliance Manager, who will formally deal with it. In case the Complaint concerns the Compliance Manager, a member of the Board will then assume responsibility for handling the Complaint. The Board member will monitor the Complaint handling process as performed by the Compliance Manager.

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

Triple Jump B.V.
For the attention of the Compliance Manager
Mensinge 78
1083 HG Amsterdam, The Netherlands

Or by email to:
compliance@triplejump.eu

6.1 Receiving a Complaint

If the Complaint is submitted to a Triple Jump's Staff member who is not the contact person of the Complainant nor the Compliance Officer, they will pass it to the Compliance Manager as soon as feasible. To be considered, a Complaint must include at minimum:

- The name and the address of the Complainant
- The date of the communication
- A description of the event to which the Complaint relates
- A signature

The description of the grievance must be sufficient, in the opinion of the employee dealing with the Complaint, so to enable a proper consideration and analysis of the facts. Triple Jump has the right not to consider a Complaint that has not been submitted in accordance with these requirements after repeated requests to the Complainant to do so.

The receipt of a Complaint is acknowledged in writing within two weeks[1] following its receipt, unless a translation is needed, making this timeframe longer. With this acknowledgment, the Complainant is also informed about the next steps in the process and when a solution is likely to be communicated.

6.2 Handling the Complaint

Triple Jump ensures that all communications regarding a Complaint received from a Client or an Investee are made in writing or via electronic communication, using plain language that is easy to understand. A complaint can be submitted in different languages, however all the communication from Triple Jump to the Complainant will be in English. In their first communication, the employee dealing with the Complaint will inform the Complainant of this Policy and provide the contact details of the Compliance Manager.

Triple Jump is not required to consider a Complaint if it relates to an action that took place more than three years prior to the submission of the Complaint. As soon as possible (and no later than within four weeks of receipt of the Complaint) Triple Jump will notify the Complainant that the Complaint will not be considered.

If the Complaint relates to the action or negligence of a member of Staff, then this employee is informed about the receipt of the Complaint. If the Complainant does not wish their identity to be disclosed, the Complainant must notify the Complaints Manager of this intention. The Complaints Manager can disregard this request if disclosing the identity of the Complainant is necessary for the proper handling of the Complaint.

As part of the investigation, the Compliance Manager:

- Will review all the available information about the Complaint and gather any other additional and relevant information;
- May contact the Complainant for a better understanding of the Complaint;
- Can discuss the case with a colleague or a Board member as a check on their own interpretation;
- Will form an opinion, and record findings and reasoning in the Complaint file;
- Will inform the IRBD Team and discuss possible solutions for the Complaint. The Board will be also informed and asked to provide advice on the proposed solution.

If a Complaint cannot be resolved within six weeks, 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.

The substance of a Complaint could trigger an internal review under the Incident Handling process.

6.3 Closing the Complaint

Once a decision has been made, the Compliance Manager will inform the Complainant in writing of the Triple Jump's position and the reasoning behind it. This written final response will:

- Summarise the relevant facts, findings, and conclusions, stating whether the case has been upheld;
- State whether it is considered appropriate to include a remedial action or some form of redress, including details of how the redress has been calculated;
- Provide details on how an alternative dispute resolution (ADR mechanism) can be obtained.

[1] Despite the Decree on Conduct of Business Supervision of Financial Undertakings under the Wft (Bgfo) does not apply to Triple Jump as specified in article 39, the Board has decided to comply with the timing requirements so to be aligned to good practices in the market.

If the Complainant disagrees in part or in full with the position taken by the Compliance Manager on behalf of Triple Jump, they are encouraged to share the reasons for the disagreement. If, following this additional attempt to address the case, the disagreement still stands, then the Complainant is informed of their right to escalate the case further in a civil court.

7. Record Keeping

The Compliance Manager keeps a record of the Complaints received and the measures taken for their resolution. All relevant details are included in a Complaint Register and saved in a folder with limited access permissions. Complaints related files include:

- The Complainant's personal information, to the extent this is relevant
- Date on which the Complaint was made
- Description of the Complaint
- When and how the Complaint was resolved
- Related correspondence and communications
- Status of the Complaint (in progress/resolved)
- Whether remedial actions followed the investigation of the Complaint

Complaint files will be retained in the Compliance folder for at least one year after the Complaint has been dealt with. This section of the Compliance folder is accessible only by authorised member of Staff.

7.1 Reporting to the AFM

Triple Jump will inform the AFM of the Complaints received from Clients and any related Complaints-handling data upon request. Complaints received from Investees are not included in regulatory reporting.

8. Process requirements

Process linked to this Policy
Investor Complaints Handling Company Regulations Incident Handling

9. Review of Policy

This Complaints Policy is reviewed by the Compliance Manager at least on an annual basis, or more frequently if:

- Changes are made to relevant laws and regulations;
- Relevant applicable guidelines are published;
- Incidents or breaches occur that require a change to this Policy;
- Otherwise deemed necessary to align Triple Jump approach to Complaints management with industry best practices.

The Compliance Manager will submit the revised version of this Policy to the Board for final approval. Once this is done, the new Policy is circulated across the relevant Staff and, if required, training and other awareness initiatives are organized to address substantial changes in the Policy and in its application.

Annexes - None