

## THE RULES FOR RESOLVING COMPLAINTS OF INVESTORS

Pursuant on Article 71 of The Law on Investment Funds and Management Companies (Official Gazette of the Republic of Slovenia, No. 31/15, as amended) and Article 14 of The Regulation on the Operations of Management Companies (Official Gazette of the Republic of Slovenia, No. 31/17; as amended; hereinafter: the Resolution), the Management Board of PRIMORSKI SKLADI, d.o.o, Koper, Pristaniška 12, Koper, adopted on 27<sup>th</sup> of June 2024, The rules for resolving complaints of investors (hereinafter: Rules).

### GENERAL PROVISIONS

#### Article No. 1 The content of the Rules

This Rules determine the procedure for resolving complaints of investment fund investors managed by Primorski sklad, d.o.o, Koper (hereinafter: investors), on one hand, and Primorski skladi, d.o.o, Koper (hereinafter: the Management Company) or persons for the marketing of investment coupon units (hereinafter: contractual marketers) authorized by the Management Company, on the other hand.

The procedure for resolving investors complaints includes:

- internal appeal procedure and
- extrajudicial resolution of disputes.

All disputes between investors and the Management Company or contractual marketers are first resolved in an internal appeal procedure.

A client who is dissatisfied with the Management Company's decision issued in the internal appeal procedure, or whose appeal within the internal appeal procedure has not been decided in the deadline referred to in this Rules, may trigger the extrajudicial resolution of disputes proceedings.

### INTERNAL APPEAL PROCEDURE

#### Article No. 2 Principles of internal appeal procedure

(1) Complaints of all investors shall be dealt with according to the principle:

- equal treatment of investors,
- prevention of conflicts of interest,
- justice and honesty,
- legality and professionalism,
- confidentiality and protection of personal data,
- efficiency and speed.

(2) Complaints are dealt with in the chronological order of their receipt.

(3) Each complaint shall be marked with the date of receipt.

(4) The investor lodges a complaint free of charge and no later than 30 days from the occurrence of the event.

(5) The investor must send a complaint in writing form to the Management Company's address: Primorski sklad, d.o.o., Koper, Pristaniška 12, 6000 Koper (hereinafter: written complaint).

(6) The electronic complaint must be submitted by e-mail to the following address: info@primorski-skladi.si (hereinafter: e-mail address and electronic complaint).

(7) An oral complaint may be filed by the investor only in personal attendance at the registered office of the Management Company at the competent person - the marketing manager. The competent person records the complaint, marks it with a date, and the investor signs it, whereby the applicant confirms the content of the written complaint (hereinafter: oral complaint).

(8) The complaint must contain the name and surname, address, reason for complaint and signature of the investor.

(9) A written complaint is considered received on the day it arrives at the Management Company's registered office.

(10) An electronic complaint is considered received on the same day as it was sent, if it is sent to the e-mail address in the Management Company's e-mail box by 4 pm on the same day. Electronic complaints that arrive at the e-mail address in the Management Company's e-mail box after 4 pm on a particular day are considered received on the following working day.

(11) An oral complaint is considered received on the day it is given in accordance with the provisions of this Rules personally at competent person - the marketing manager, at the Management Company's headquarters.

(12) Any complaint from the investor containing a claim for damages must be given in writing form.

(13) The Management Company enables the given of a complaint in the Slovenian language, in case the units of investment funds are marketed in the Member States European Union, the Management Company allows to given a complaint in the official language or in the official languages of the country where the investment funds units are marketed.

(14) A complaint is to late if it is filed after the expiration date, as determined by this Rules for given an complaint.

(15) A complaint is not allowed if it was given by a person who did not have this right.

(16) A complaint is improperly given if it is not given in accordance with this Rules.

(17) Late, inadmissible or improperly submitted complaints are not obliged to be dealt with by the Management Company.

(18) The complaint is considered complete if it was sent in writing to the Management Company's headquarters, in electronic form to the e-mail address or was received orally at the Management Company's headquarters with the competent person - the marketing manager. The complete appeal must contain the information referred to in paragraph 8 of this Article, but it must not be too late, unauthorized or improperly filed.

### Article No. 3 Internal appeal procedure

(1) After receiving a complaint the marketing manager, first checks whether the received application constitutes an appeal within the meaning of this Rules. If not, the appeal procedure shall be stopped, reject the application and inform the applicant accordingly.

(2) If the marketing manager establishes that the complaint is within the meaning of this Rules, it shall initiate a procedure of investigation of the facts and circumstances for the purpose of establishing the validity of the ground of appeal. All employees and contract marketers are required to provide evidence and clarify the details of the ground of appeal.

(3) The marketing organizer which is responsible for resolving complaints shall notify the company's Management Board of any complaint within the meaning of this Rules. The company's

Management Board is independent in resolving complaints. The response to the complaint is signed by the company's Management Board.

(4) If the complaint is incomplete, the Management Company is obliged to invite the applicant to supplement the complaint within 15 days of receiving the complaint. If the applicant does not file a complete appeal within 15 days after the invitation from the Management Company, the appeal shall be rejected in accordance with the instructions for supplementation.

(5) The Management Company shall send the applicant a written answer by registered mail within 30 days of receiving the complaint to the address indicated on the accession declaration or to the e-mail address if the applicant provided it for mutual business purposes and agrees to receive notifications in that way. The Management Company's response to the applicant consists of establishing the facts, proposing a solution to the dispute and providing legal advice to the applicant on the possibility of out-of-court dispute resolution. If this period expires and the investor has not received a reply, the appeal shall be deemed unfounded.

(6) At the request of the applicant and free of charge, the applicant shall be provided with access to the documentation and information related to his complaint at the Management Company's registered office in person, unless prohibited by law and other internal acts of the Management Company. Exceptionally and on the basis of a written decision of the company's Management Board, photocopies of reviewed documentation and information shall be provided to the applicant.

(7) The Management Company may:

- upholds the appeals in full in the internal appeal procedure;
- upholds in part and rejects in part or
- refuses in its entirety.

(8) After the completion of the appeal procedure the marketing manager, shall enter the decision on the appeal in the evidence of investors complaints.

#### Article No. 4

##### Tasks and responsibilities of the Management Company in relation to investor complaints

(1) Complaints are handled by the Investor Relations Department. The marketing manager is in charge of performing the function and has the following tasks and responsibilities:

- decides whether the appeal is within the meaning of this Rules;
- collects data and documentation on appeal cases that clarify the circumstances of the causes of appeals;
- keeps evidence of received complaints from investors;
- forwards the complaint to the management of the Management Company responsible for resolving the complaint;
- supervises the deadlines for responding to the complaint;
- takes care of a fair, fast, successfully and efficient complaint processed;
- warns the company's Management Board on possible irregularities in business in internal appeal procedures;
- prepares reports for the company's Management Board and the Securities Market Agency;
- proposes to the company's Management Board improvements, guidelines, recommendations to eliminate the causes of complaints and improve operations in general.

(2) The Management Company shall keep evidence of the received complaints of investors and the measures taken to resolve them. The method of keeping and the content of the evidence of received complaints from investors is determined by the Rules on the Method of Keeping Evidence and the Evidence of Processing Activities - Evidence of Complaints of Investors.

(3) At the request of the competent authority, the Management Company shall ensure the availability of information regarding the resolution of investors complaints to the public and the

Securities Market Agency. The Management Company reports to the Securities Market Agency on the number of complaints received, together with a brief description of the reason for the complaint and the measures taken in relation to previous complaints. The marketing manager shall submit a report on the received complaints of investors to the head of the regulatory compliance service, who shall report on the received complaints of investors to the Securities Market Agency within the prescribed deadlines.

(4) The Management Company regularly analyzes data on the processing of complaints, to ensure that recurring or systemic problems, as well as possible legal and operational risks are identified and eliminated. The marketing manager submits to the company's Management Board once a year, by 31 March at the latest, a report on investors complaints in the previous year, analyzing the disputed relationships, as well as their manifestations and the reasons for their occurrence.

#### Article No. 5

##### Introduction to the rules of internal appeal procedure

The Management Company or persons authorized by the Management Company for marketing investment coupons units, are obliged to acquaint the investor when approaching the rules of management of sub-funds of the umbrella fund with the content of this Rules.

This Rules are available to investors and future investors on the Management Company's website [www.primorski-skladi.si](http://www.primorski-skladi.si), at all authorized registration points and at the registered office of the Management Company Primorski sklad, d.o.o., Koper, Pristaniška 12, 6000 Koper. The investors are also informed about the existence of this Rules through the prospectus with the included rules of management of the umbrella fund, which is published on the Management Company's website [www.primorski-skladi.si](http://www.primorski-skladi.si).

## EXTRAJUDICIAL RESOLUTION OF DISPUTES

#### Article No. 6

##### Elements of an extrajudicial resolution of disputes scheme

All disputes between investors and the Management Company or persons authorized by the Management Company for marketing investment coupons units, which cannot be resolved in the internal appeal procedure, will be resolved before arbitration in accordance with the provisions of the internal Rules of an extrajudicial resolution of disputes.

For an extrajudicial resolution of disputes is competent The Arbitration of the Slovenian Investment Fund Association (hereinafter: Arbitration), at Čufarjeva 5, 1000 Ljubljana.

If the applicant initiates proceedings before the Arbitration, the costs of the proceedings shall be calculated in accordance with its applicable tariff.

## FINAL PROVISIONS

This document is valid from June 28, 2024.

The company's Management Board