

APPROVED
SIA Provendi Asset Management AIFP
Registration No. 40203438204
During the Board Meeting on February 22, 2023

SIA Provendi Asset Management AIFP Procedure for Reviewing Applications and Complaints

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1. Terms used

Responsible Person	A member of the Company's Board, responsible for legal functions
Employee	A company employee.
Investor	A legal entity investing in the Fund.
Procedure	This is the Procedure for reviewing applications and Complaints.
Services	The services and additional services provided by the Company for Fund management.
Company	Alternative Investment Fund Manager SIA Provendi asset management AIFP, registration number 40203438204.
Fund or AIF	Alternative Investment Fund INDEXO REAL ESTATE FUND AS, registration number 40203443258, managed by the Company.
FTKT recommendations	the Financial and Capital Market Commission (FKTK) recommendations (starting from January 1, 2023, the Bank of Latvia) recommendations No. 11 (January 21, 2015). Recommendations on the Procedure for Handling, Registration, and Providing Information on Complaints Received by Credit Institutions, Cooperative Savings and Loan Associations, Investment Brokerage Firms, Investment Management Companies, Alternative Investment Fund Managers, Payment Institutions, and Electronic Money Institutions.
Complaint	Submission, Notice, or Complaint Regarding Dissatisfaction with the Provision of Company Services. In the context of the Complaint Procedure, a notice is not considered valid if it does not include the full name and information allowing the unambiguous identification of a natural person, or for a legal person, the name and registration number are not specified.
Complainant	An Investor or a prospective Investor who has submitted the Complaint.
Complaints Register	The electronic Complaints Register of the Company.

2. General Provisions

- 2.1. The purpose of the Procedure is to determine the order of accepting, registering, and examining Complaints, as well as the Procedure for the Company to analyze and respond to Complaints.
- 2.2. The Company ensures a prompt, equal, fair, and effective examination of Complaints and the provision of substantive responses, avoiding a formal process of examining Complaints and providing responses.
- 2.3. The Company ensures the protection of the information provided by the Complainant and their personal information in accordance with the regulatory requirements in the field of personal data processing.

- 2.4. The Company ensures that the current version of the Procedure is always freely available at the legal address of the Company (office location) during the Company's working hours and on the Company's website indexore.lv.
- 2.5. The Procedure is developed in accordance with the Law on Alternative Investment Funds and Their Managers and the Recommendations of the Financial and Capital Market Commission (FKTK).

3. Responsibilities of Responsible Persons

- 3.1. The Responsible Person ensures the fulfillment of the obligations specified in the Procedure by the Company.
- 3.2. The Responsible Person is responsible for the process of examining Complaints, ensuring the verification of facts stated in Complaints, the effectiveness control of the Complaint examination process, and compliance with reporting according to the Procedure.
- 3.3. The Responsible Person ensures that all employees are familiar with the Procedure and that the Procedure is freely accessible to them.
- 3.4. Any actions that, according to the Procedure, must be performed by the Responsible Person, the Responsible Person may delegate to another employee.

4. Complaint Submission Procedure

- 4.1. The Complainant may submit a Complaint free of charge by:
 - 4.1.1. Submitting it in writing, by sending it by mail or delivering it to the Company in person at the address: Daugavgrīvas iela 7B, Rīga, LV-1048;
 - 4.1.2. Submitting it electronically, by sending an email to the email address: info@indexore.lv;
 - 4.1.3. Expressing it verbally if it is recorded in writing per point 6.2 of the Procedure.

5. Content of the Complaint

- 5.1. The Complaint must include the following information:
 - 5.1.1. Legal entity name and registration number;
 - 5.1.2. A detailed description, if possible, of the circumstances that are the cause of the Complaint. This should include the location and time of the occurrence of these circumstances, the Employee if the cause of the Complaint is the actions of the Employee, a reference to the specific provisions of a document if these provisions are the reason for submitting the Complaint;
 - 5.1.3. Justification of why the specific situation causes dissatisfaction;
 - 5.1.4. Date and place of submitting the Complaint;
 - 5.1.5. Legal address of the Complainant or another address where the Complainant wishes to receive a response;
 - 5.1.6. Email address of the Complainant if the Complainant wishes to receive the Company's response electronically. In this case, the Complainant may not provide the address specified in point 5.1.5 of the Procedure.
- 5.2. The Complaint must be signed:
 - 5.2.1. Personally if the Complaint is sent by mail or submitted in person. For a legal person, the signatory's position and basis of representation must be indicated;
 - 5.2.2. If the Complaint is sent electronically by email, the Complaint must be signed with a secure electronic signature containing a timestamp. For a legal person, the signatory's position and basis of representation must be indicated;

- 5.2.3. If the Complaint is submitted by an authorized person, the identifying information of the authorized person must be provided (name, surname, personal code or date of birth and identification data if there is no Latvian personal code), and a certified copy of the authorization must be attached or a copy of the authorization must be sent, certified with a secure electronic signature, or the original authorization must be presented.
- 5.3. If the Complaint is substantiated with documents, the relevant documents or their copies must be attached.

6. Acceptance of Complaints

- 6.1. Any Employee / Company official shall accept the Complaint no later than the next working day, informing the Responsible Person about it.
- 6.2. If a Complaint is expressed verbally, the Employee / Company official requests the Complainant to formalize it in writing personally, or, if requested by the Complainant, the Employee / Company official personally documents the Complaint in writing and asks the Complainant to sign it personally. All requirements specified in point 5.1 of the Procedure apply to a Complaint thus formalized. The original Complaint must be handed over to the Responsible Person no later than the next working day.
- 6.3. Immediately upon receipt, the Responsible Person registers the Complaint in the Complaint Register.
- 6.4. Every working day, the Responsible Person checks the email info@indexore.lv to promptly identify received Complaints. During their absence, the Responsible Person ensures access to this email address for the Employee who substitutes for them.
- 6.5. If the Complaint is received in person at the Company's office or if a written form is given to a verbally submitted Complaint, it must be copied. The copy must be signed to acknowledge the receipt of the Complaint, indicating the date of receipt, and the signed copy must be returned to the Complainant as evidence of receiving the Complaint. On the original Complaint, the Employee / Company official signs, providing their name, surname, position, and the date of receiving the Complaint. The original Complaint must be handed over to the Responsible Person no later than the next working day.
- 6.6. Upon receiving the Complaint electronically, the Responsible Person sends a confirmation response letter to the Complainant's email address from which the Complaint was received, indicating the planned timeframe for handling the Complaint.

7. Complaint Review and Response

- 7.1. Within the limits of their competence and legal possibilities, the Responsible Person examines the circumstances indicated in the Complaint. In doing so, the Responsible Person performs at least the following actions:
 - 7.1.1. Requests explanations from the Employee mentioned in the Complaint and verifies the information provided by them;
 - 7.1.2. Checks the information available to the Company (documents, electronically stored information, email correspondence, phone call records, etc.);
 - 7.1.3. If necessary, obtains additional information from public registers and other public sources.
- 7.2. The Responsible Person immediately informs the board if:
 - 7.2.1 Due to the Complaint, the Company faces a reputational risk and/or there is a significant risk of incurring losses of at least EUR 1000 (one thousand euros);

- 7.2.2 During the Complaint review, it is found that the Company has violated internal or external regulations.
- 7.3. Upon receiving the report mentioned in Procedure 7.2, the Company's board, within 5 (five) working days, decides on the necessary actions to mitigate the Company's reputational risk and/or the risk of incurring losses and/or actions to immediately terminate the violation of internal or external regulations.
- 7.4. If, due to the Complaint, the Company faces a significant risk of incurring losses of at least EUR 1000 (one thousand euros), the final version of the response to the Complaint is coordinated and approved by the board.
- 7.5. The Responsible Person responds to the Complaint within 30 (thirty) calendar days from the day of receiving the Complaint. If, for objective reasons, it is not possible to provide a response within this period, the Responsible Person informs the Complainant in writing or electronically (if the Complainant has agreed to electronic communication) of the deadline for responding, justifying the need for an extension. The extension period must be reasonable and justified but not longer than 90 (ninety) calendar days.
- 7.6. The response must be substantiated and based on evidence and information obtained during the Complaint review process. The response must indicate the Company's attitude towards the circumstances indicated in the Complaint, including whether the Company agrees with what is stated in the Complaint.
- 7.7. The response is provided according to the indicated method of receiving the response in the Complaint:
- 7.7.1. If the response to the Complaint is provided in writing, the signed paper response is sent to the Complainant in a registered letter or by other means, documenting the fact of sending, or delivered to the Complainant personally against a signature;
- 7.7.2. If the response to the Complaint is provided electronically, the signed response with a secure electronic signature containing a timestamp is sent to the Complainant's email address indicated in the Complaint.
- 7.8. The response must be in Latvian, using as simple and understandable language as possible. Upon the written request of the Complainant, the Company may provide the response in English or Russian.
- 7.9. The response also informs the Complainant about other feasible options for Complaint resolution if the Company's response does not fully satisfy the Complainant's demands. This includes stating that the Company's activities are monitored by the Financial and Capital Market Commission (FKTK) and that the Complainant can address:
- 7.9.1. FKTK (K. Valdemāra iela 2A, Rīga, LV-1050, <https://www.fktk.lv>);
- 7.9.2. the court.
- 7.10. The response also indicates that if the Complainant incurs losses due to incorrect information provided by the Company or because the Company has not fulfilled the requirements of regulations, the Complainant has the right to seek compensation for damages in accordance with the general Procedure established in the regulatory enactments.
- 7.11. The Responsible Person has the right to request additional information about the Complainant and/or their authorized person if there are doubts that another person has submitted the Complaint on behalf of the Complainant, and this person is not the authorized person of the Complainant. In this regard, the Company may contact the Complainant to ensure that they have issued the relevant authorization.
- 7.12. The Responsible Person is entitled to request the Complainant or their authorized person to provide additional information about the circumstances indicated in the Complaint.

- 7.13. At the request of the Complainant, the Responsible Person informs them in writing or electronically (if the Complainant has agreed to electronic communication) about the Complaint review process.
- 7.14. Responses to Complaints are provided free of charge.
- 7.15. The Company responds only to Complaints that comply with the requirements specified in points 5.1 and 5.2 of the Procedure.
- 7.16. If the Complainant indicates that they do not want to receive a response to the Complaint, no response is provided, but the Complaint is reviewed and assessed in accordance with the Procedure established.

8. Personal Interests

- 8.1. If a Complaint is filed against the Responsible Person, the Responsible Person immediately informs the Company's board, and the Company's board delegates another Employee/Senior Company official to perform all the duties of the Responsible Person specified in the Procedure regarding this Complaint.
- 8.2. If a Complaint is filed against a member of the Company's board, this board member does not participate in decision-making related to the review of the Complaint.
- 8.3. Any Employee who suspects personal interests of another employee or company official in the Complaint review process reports it to the Responsible Person, substantiating their suspicions. The Responsible Person records these reports in the Complaint Register, evaluates the circumstances mentioned in it, and takes necessary measures in this regard.

9. Complaints Register

- 9.1. The Responsible Person is responsible for maintaining the Complaints Register and the accuracy of its records.
- 9.2. Complaints Register data are accessible to the Company's board and the Responsible Person. The Responsible Person may grant access rights to Employees with or without the authority to make corrections/entries in the Complaints Register.
- 9.3. The Complaints Register must reflect all actions and decisions made during the Complaint review process, including at least:
 - 9.3.1. information about the Complainant (name or company name) and their contact information;
 - 9.3.2. the date of receiving the Complaint;
 - 9.3.3. the reason and essence of the Complaint;
 - 9.3.4. actions/decisions taken when evaluating the Complaint and preparing a response;
 - 9.3.5. the date when the response to the Complaint was sent;
 - 9.3.6. the result of the Complaint review (including whether the Complainant was compensated for losses/expenses, etc.);
 - 9.3.7. the date of all the above actions and decisions.
- 9.4. Entries in the Complaints Register must be made no later than the next working day after the relevant action/decision.
- 9.5. For each Complaint, the Responsible Person creates an electronic folder where all related information is stored, including Employee explanations, reports to the Company's board, a copy of the Complaint response, etc. If the Complaint is submitted in writing, its copy is stored electronically, while the original Complaint is kept in accordance with the Company's record-keeping regulations.

- 9.6. The Company retains information about received Complaints and provided responses for at least 5 (five) years from the moment when a response to the Complaint is provided and it is deemed that the Complaint process has concluded.

10. Complaint Analysis and Procedure Effectiveness

- 10.1 The Responsible Person prepares a report for the Company's board by March 31 of each year on the causes of Complaints in the previous calendar year, the compliance of the Complaint review process with the Procedure, and the effectiveness of the Complaint review process. In the report, the Responsible Person analyzes the causes of Complaints and provides suggestions for addressing these causes and improving the Complaint review process.
- 10.2 The Company's board reviews the report specified in Procedure 10.1 no later than one calendar month and decides on specific measures to address the causes of Complaints/improve the Complaint review process, if necessary, specifying specific deadlines for the implementation of these measures.
- 10.3 The Responsible Person monitors the implementation of the measures decided by the Company's board, promptly informing the board of any obstacles to the implementation of these measures.

11. Procedure Revision

- 11.1. The Procedure is revised as needed.