

COMPLAINT POLICY

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Function(s):	All
Responsible:	Chief Executive Officer
Date:	November 2023

1 POLICY

It is the Firm's policy to monitor and review all complaints relating to its securities business in a responsive and fair manner. A complaint is viewed as any negative written statement by a client or potential client or its representative that involves services provided by Global Evolution or any of its employees. This includes operational or service issues. All complaints in writing shall be treated with seriousness and dealt with immediately in accordance with these procedures.

2 LEGAL BASIS

Art. 26 of EU Regulation 2017/565 and art. 16(2) of directive 2014/65 form the legal basis for the requirement to have a complaint handling policy.

3 COMPLAINT RESPONSIBLE

The Chief Executive Officer of Global Evolution is responsible for dealing with any client complaints. Complaints can be sent to complaint@globalevolution.com, which will be forwarded to the Chief Executive Officer and the compliance department.

It is the responsibility of everyone in Global Evolution to bring complaints, possible complaints or the potential for an issue to turn into a complaint to the attention the Chief Executive Officer of Global Evolution as soon as it is detected.

4 COMPLAINT HANDLING

Any complaint should be forwarded to the Chief Executive Officer within 24 hours after it is received. If urgent action may be necessary, an initial phone call to the Chief Executive Officer should be made immediately to inform about the situation.

The Chief Executive Officer shall provide a written or verbal confirmation to the complainant that the complaint has been received and that a comprehensive response will be provided within an appropriate time. A copy of any communication shall be maintained or noted in the file.

The Chief Executive Officer shall start dealing with the complaint within 2 business days of receipt. The Chief Executive Officer institutes a more detailed investigation of the circumstances of the complaint to the extent necessary. The complaint shall be answered as soon as possible. Complaints concerning more straightforward matters should be answered within 10 business days of receipt.

Global Evolution maintains a Complaints Register with a log of all complaints, including details about the complaint, documentation received from the complainant, any documentation developed for investigation and handling of the complaint, as well as information about the complaint resolution.

If the complaint becomes a legal issue, the Chief Executive Officer may confer with internal or outside counsel for appropriate action to the extent necessary.

The company shall seek to reach a resolution to a complaint as soon as possible, taking into consideration the complexity of the matter concerned.

Complaints concerning the Chief Executive Officer must be brought to the attention of the Deputy Chair of the Board of Directors, who will decide whether it can be dealt with by the Board of Directors at the next board meeting or an extraordinary meeting should be convened.

5 ANKENÆVNET FOR FONDSMÆGLERSELSKABER

Global Evolution is a member of Ankenævnet for Fondsmæglerselskaber (the Complaint Board for Investment Firms). The Complaint Board deals with complaints raised by private individuals and may deal with complaints from businesses that are not materially different from complaints related to private client relationships. The Complaint Board does not deal with complaints from companies.

If a mutual resolution cannot be agreed with the complainant, the complainant must be informed about the possibility to raise the complaint with the Complaint Board if this applies to the specific complaint and complainant. Only clients of Global Evolution Fondsmæglerselskab A/S (i.e. not Global Evolution USA, LLC or other group companies) may raise complaints to the Complaint Board.

6 PUBLICATION

Information about Global Evolution's Complaint Responsible and how to contact the company's Complaint Responsible and this Complaint Policy must be made available on the company's website.

7 REVIEW AND APPROVAL OF THIS POLICY

This policy is approved by the Board of Directors and must be reviewed as and when required, but at least on an annual basis.

Version	Approval Date	Made by	Approved by
1	5 November 2020	RBP	BOD
2	November 2023	AMH	BOD