

## POLICY ON COMPLAINTS

Document type:	Policy
Function(s):	All
Responsible:	Chief Executive Officer (CEO)
Disclosure level:	Public
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### 1. PROCEDURE

Global Evolution Asset Management A/S's (hereinafter referred to as "Global Evolution" or "the Company") procedure 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. Note that the term 'Client' also refers to the investors of the funds managed by the Company. 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

Executive Order 1558 of 6-Dec-2024 about the complaints responsible and financial companies' handling of complaints, form the legal basis for the requirement to have a complaint handling procedure.

**For the Luxembourg domiciled managed UCITS funds:** The legal basis are the CSSF Regulation N° 16-07 relating to out-of-court complaint resolution. Article 133(3) of the Law of 17 December 2010 relating to undertakings for collective investment.

### 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](mailto: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 of the Chief Executive Officer of Global Evolution as soon as it is detected.

### 4. FILING OF THE COMPLAINT

The Complainant must address a written complaint, in the first instance, to the Executive Board of the Company:

**By email:**

[complaint@globalevolution.com](mailto:complaint@globalevolution.com)

**By post:**

Global Evolution Asset Management A/S  
Att. Morten BUGGE, Chief Executive Officer and Chief Investment Officer  
Buen 11, 2nd Floor | DK-6000 Kolding | Denmark  
CVR no. 30602153

## 5. 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 confirmation** to the complainant within **three (3) Denmark working days** (when the complaint relates to the management company) or no later than **ten (10) Luxembourg business days** (when the complaint relates to the Luxembourg domiciled funds) 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 two (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 each 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.

### Procedure for the Luxembourg domiciled managed UCITS funds:

The Chief Executive Officer shall provide a written confirmation to the complainant **no later than ten (10) Luxembourg business days** that the complaint has been received and that a comprehensive response will be provided within an appropriate time.

Complaints concerning more **straightforward matters** should be **answered within 10 business days of receipt**. If the answer can't be provided within 10 business days, the Company aim to **answer** client complaints in writing **within 20 (twenty) business days** (in the Grand Duchy of Luxembourg), and **at latest within one (1) month**, from the date at which the complaint was received.

Where an answer cannot be provided within this period, the Company shall inform the complainant of the causes of the delay and indicate the date at which its examination is likely to be achieved.

Each complainant is informed of the name and contact information of the person in charge of his/her file. As far as possible, that person will be the contact person of the complainant throughout the internal handling procedure for his/her complaint.

In accordance with the CSSF Regulation 16-07, the Company will provide the Complainant with a written explanation of the outcome of the investigation and any actions taken to solve the complaint.

More information about the Complaint Policy is made available by the Company in hard copy free of charge to the investors, upon request.

Where a customer did not receive a response within one month of a complaint being submitted to us, the complainant can bring this matter to the CSSF, as an out-of-court resolution possibility.

Requests to the CSSF on out-of-court resolution can be filled via the Website of the CSSF in accordance with the regulation 16-07. The customer can refer their complaint to the CSSF within one year of the date of filing with Global Evolution Manco by the following means:

- Mail address to the Commission de Surveillance du Secteur Financier, 283, route d'Arlon, L-2991 Luxembourg
- Email at [reclamation@cssf.lu](mailto:reclamation@cssf.lu)

## 6. ANNUAL REPORTING TO THE CSSF

**For the Luxembourg domiciled managed UCITS funds**, the Company is required to communicate to the CSSF, on an annual basis, and **no later than five (5) months** after the end of the year to which it relates to, a table including the number of complaints registered by the funds, classified by type of complaints, as well as a summary report of the complaints and of the measures taken to handle them.

The template to complete is available here:

<https://www.cssf.lu/en/Document/table-listing-the-claims-registered-by-the-professional/>

## 7. 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 and the Luxembourg version on the website of the Luxembourg domiciled managed UCITS funds.

## 8. REVIEW AND APPROVAL OF THIS POLICY

The review and approval of this policy and the related documents are the responsibility of the Board of Directors of the Company, with the input and advice of the Executive Management, the Head of Legal & Compliance, and the external auditor. Any amendments or revisions to this policy and the related documents are communicated to relevant staff in a timely manner.

This policy is reviewed and approved by the Board of Directors on an annual basis.

Version	Approval Date	Revision detail	Made by	Approved by
1.	5 November 2020		RBP	BoD
2.	November 2023		AMH	BoD
3.	14 November 2024		AMH	BoD
4.	November 2025	Date update	SJ	BoD
5.	March 2026	Update of the legal basis and update of the Luxembourg related procedure	SM	BoD