

Complaints Handling Policy

1 Purpose

At Pareto Securities we aim to provide the highest standard of service and integrity to our clients. However, we are aware that there may be occasions where we may not achieve this goal, and this may result in a complaint. This policy sets out the principles for how Pareto Securities handles complaints.

2 Receiving complaints

The compliance department is responsible for the handling of client complaints at Pareto Securities and shall immediately be informed by any member of staff of client complaints. The person receiving the complaint shall not engage him- or herself in any dialogue regarding the complaint with the client until the matter has been discussed with the Compliance department.

If oral complaints are maintained in contact with the Compliance department, the client will be informed that only written complaints will be assessed on their merit. If the client needs assistance with the drafting of a complaint, the Compliance department can provide the necessary assistance.

The Compliance department will, on request, provide a client wishing to file a complaint with written information about the procedures for the handling of complaints, including information about how to file a complaint.

A client filing a complaint shall receive written confirmation to the effect that the complaint has been received. The confirmation shall specify the expected timeframe for deliberation of the complaint, as well as the right to have a complaint deliberated by the Ethics Council of the Norwegian Securities Dealers Association for customers of Pareto Securities AS.

3 Registration of complaints

All complaints will be registered in a designated Register of Complaints, including the following details:

- Date of receipt
- Client identity
- Brief description of the complaint contents
- Date of reply
- An account of the main aspects of the reply
- Whether the complaint has resulted in a need for internal measures

Documentation relating to the complaint will be retained by Pareto Securities for no less than five years after completion of the complaint handling.

4 Deliberation of complaints

All complaints shall be subjected to thorough deliberation, during which deliberation potential conflicts of interest shall be identified and curtailed.

The deliberation of a complaint requires the Compliance department to:

- (i) Gather all relevant information and perform a comprehensive evaluation of the complaint.
- (ii) Communicate in clear and unambiguous language with the client who filed the complaint.
- (iii) Provide a reply in respect of the complaint without undue delay. If no reply can be provided within the expected timeframe for deliberation of the complaint, the Compliance department shall inform the client that filed the complaint of the reason therefore, as well as of when deliberation of the matter is expected to be completed.
- (iv) Written grounds shall be provided in support of any decision that is not fully in favour of the client that filed the complaint, and such client shall be informed of the right to have the matter deliberated by the Ethics Council of VPF (Verdipapirforetakeres Forbund).

Based on information emerging in complaints, the Compliance department shall on an on-going basis:

- Analyse the information received in the complaints to determine whether such complaints are caused by systematic or fundamental problems;
- evaluate whether the contents of complaints merit the establishment of new internal procedures, employee training or other administrative measures.

5 Regulatory reporting

Pareto Securities will report to each regulator, in accordance with the relevant regulation in the jurisdiction which it operates as an organisation, the details of any received complaints.

Adopted by the CEO of Pareto Securities on 10 February 2021