

# Nordic Investment Opportunities A/S

## Complaints handling procedure

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## 1. Background and purpose

- 1.1 Nordic Investment Opportunities A/S (“**NIO**”) is an alternative investment fund manager (“**AIFM**”) based in Copenhagen. NIO has been founded by the senior partners of NREP A/S and Copenhagen Infrastructure Partners P/S with the aim of facilitating investments in the Nordic region in certain fund-of-funds and feeder funds which shall invest in alternative investment funds within infrastructure, real estate, private equity, private debt and venture capital.
- 1.2 This procedure for complaints handling (the “**Procedure**”) is adopted to ensure that NIO is compliant with the regulation on the AIFM’s handling of complaints and appointment of a complaint responsible.
- 1.3 The Procedure sets out the processes which NIO has established for its handling of Complaints (as defined below) covered by the scope of this Procedure, including roles and responsibilities.

## 2. Definitions

- 2.1 Unless the context requires otherwise, the following definitions shall have the meanings ascribed thereto:

“ <b>AIF</b> ”	means an alternative investment fund managed by NIO;
“ <b>Board of Directors</b> ”	means the board of directors of NIO, as registered with the Danish Business Authority from time-to-time;
“ <b>CEO</b> ”	means the chief executive officer appointed by the Board of Directors;
“ <b>Complaint</b> ”	means a statement of dissatisfaction addressed to NIO by a Complainant in relation to (i) the Complainant’s retail customer relationship or (ii) commercial matters that do not deviate significantly from the Complainant’s retail customer relationship;
“ <b>Complainant</b> ”	means a natural or legal person who is presumed to be eligible to make a Complaint through having a retail customer relationship with NIO;
“ <b>Complaints Responsible Person</b> ”	means the person appointed by the Board of Directors to handle Complaints in accordance with this Procedure;

<b>“Compliance Officer”</b>	means the compliance officer of NIO appointed by the Board of Directors pursuant to the compliance policy;
<b>“Danish FSA”</b>	means the Danish Financial Supervisory Authority; and
<b>“NIO”</b>	means Nordic Investment Opportunities A/S;

### 3. Scope

- 3.1 This Procedure only applies to Complaints concerning NIO's retail customer relationships as set out in Executive Order no. 1219 of 20 November on the complaint responsible and financial institution's handling of complaints, section 1(2) (the **“Executive Order”**), to the extent this apply to NIO.
- 3.2 This includes, without limitation, any requirement for NIO to provide key information documents regarding units in AIFs which constitute a packaged retail investment product (PRIP) in accordance with the Regulation 1286/2014 of 26 November 2014 on key information documents for packaged retail and insurance-based investment products (the **“PRIIPs Regulation”**).
- 3.3 NIO does not offer publicly available units in AIFs and as such its only potential retail customer relationships relate to privately solicited units in AIFs. Furthermore, NIO only offer units in AIFs to professional investors (as defined in MiFID II) and to semi-professional investors (in accordance with section 5(5) in the AIFM Act), i.e. NIO will only have retail customer relationships where it offer units in AIFs to semi-professional investors, who is regarded as retail customers in the sense of this Procedure.

### 4. Division of responsibilities

- 4.1 The CEO is overall responsible for the adequate implementation and monitoring of NIO's compliance with this Procedure.
- 4.2 The Board of Directors has appointed the Compliance Officer as the person responsible for NIO's handling of Complaints (the **“Complaints Responsible Person”**). The Complaints Responsible Person is responsible for ensuring a fair investigation of all Complaints and that all potential conflicts of interest in connection herewith are identified and mitigated.

### 5. Handling and responding to Complaints

- 5.1 The Complaints Responsible Person shall handle all Complaints:
- (a) specifically addressed to the Complaints Responsible Person; and
  - (b) where it has not been possible for another department within NIO receiving a complaint to settle the relevant issue.

- 5.2 The Complaints Responsible Person (or any person to which the Complaints Responsible Person has delegated its duties to in its absence) shall confirm receipt of a Complaint to the Complainant within 3 Business Days. NIO shall in connection with acknowledging its receipt of a Complaint provide the Complainant with information regarding the expected process for NIO's handling of the Complaint.
- 5.3 The Complaints Responsible Person shall provide a final decision to Complainants without any unnecessary delay and within a reasonable time. When an answer cannot be provided to a Complainant within a commercially reasonable time limit, the Complaints Responsible Person shall inform the Complainant about when NIO's investigation of the matter is likely to be completed.
- 5.4 When the Complaints Responsible Person provides a final decision in terms of a Complaint, the Complaints Responsible Person shall provide the Complainant with a thorough explanation of NIO's position on the Complaint and set out the Complainants option to maintain the complaint by e.g. the availability of contacting the Danish FSA.
- 6. Information to clients on process for handling Complaints**
- 6.1 NIO shall, on request, or when acknowledging its receipt of a Complaint, provide written information regarding its complaints-handling process.
- 6.2 NIO shall publish details on its complaints-handling process in an easily accessible on its website [www.nio.partners](http://www.nio.partners) providing clear and accurate information on NIO's complaints-handling process, including details on how to complain and the process that will be followed by NIO's Complaints Responsible Person when handling a Complaint.
- 7. Registration of Complaints and follow-up on complaints handling**
- 7.1 The Complaints Responsible Person shall register all received Complaints in a secure excel-sheet designed for the purpose in accordance with Schedule 7.1 (corresponding to Annex IV to the Danish FSA's guidelines to the Executive Order). Such registrations shall include a specification of the scope, status and outcome of any Complaint.
- 7.2 The Complaints Responsible Person shall, on an ongoing basis, analyze the data regarding NIO's handling of Complaints with the aim of ensuring that NIO identifies and addresses any recurring or systemic problems, including potential legal and/or operational risks which have given rise to Complaints.
- 8. Reporting to the Danish FSA**
- 8.1 NIO shall, upon request from the Danish FSA, report any necessary information concerning Complaints to the Danish FSA.
- 9. Approval**
- 9.1 This Procedure shall be reviewed at least once a year by the Complaints Responsible Person.

9.2 This Procedure was approved by the CEO on 29 April 2020.

**10. Approval history**

<b>Version:</b>	<b>Effective from:</b>	<b>Changes:</b>	<b>Performed by:</b>
1	[date]	<p>Approved 29 April 2020 by the CEO in connection with application to convert investment firm license to an AIFM license.</p> <p>This procedure shall apply following receipt of AIFM license from the Danish FSA.</p>	Approved by the CEO

**Schedule 7.1 – Form for registration of complaints**

<b>Alternative investment fund managers</b>				
	<b>No. complaints received in [year]</b>	<b>Partially accepted</b>	<b>Accepted in full</b>	<b>Denied</b>
<b>Savings</b>		[Scope/status/outcome]	[Scope/status/outcome]	[Scope/status/outcome]
<b>Investment</b>				
<b>Marketing</b>				
<b>Advice</b>				
<b>Governance</b>				
<b>Costs etc.</b>				
<b>Other</b>				
<b>Total no. of complaints</b>				

