



**PROCEDURE
ON REGISTRATION, MANAGEMENT, SETTLEMENT
AND ARCHIVE OF COMPLAINTS**

PURPOSE

Registration, management, settlement and archive of complaints received at the I. M. headquarters.

DEFINITIONS AND ABBREVIATIONS

I.M. = SAI Muntenia Invest SA

C.I.U. = Collective investment unit

U.C.I.T.S. = Undertakings for collective investment in transferable securities

A.I.F. = Alternative Investment Fund

Complaint = request, complaint or referral that brings to the attention of the I.M. acts likely to affect the rights or interests of the complainant, made in writing and submitted to the headquarters of the MI, mailed or e-mailed, through which a complainant or his lawful empowered person, who acts exclusively on behalf of the applicant and without having his own commercial interest, expresses its dissatisfaction with the service and investment activities provided under Law no.297/2004 and Law no. 74/2015, the service of portfolio management for collective investment of the CIU or information provided by the I.M. after requests for information received from complainants.

Complainant = natural or legal person, investor in the entities managed by the I.M., submitting a petition to the I.M. on the service and investment activities provided under the law or provision of collective investment portfolio management of the UCITS/AIF.

Complaint favourably settled = complaint on which measures have been taken to redress the situations claimed

Complaint unfavourably settled = complaint on which no measures have been taken

GENERAL CONSIDERATIONS

1. Provisions regarding the form and content of complaints:

The complaints must be made in writing and contain at least the following information:

- the identity of the complainant (name first name / denomination, PIN / SIC), including home/office address, telephone number/fax, email, etc;
- the subject of the complaint, ie a brief description of the issue submitted to the attention and the reasons for submitting the complaint;
- service/activity performed to which it refers;
- name, surname and title of the persons within the I.M. to whom the complaint was addressed or to whom the complainant asked the respective service/activity(s);
- damage alleged by the complainant (if applicable);
- copies of relevant documents that could help solve the complaints, as applicable;
- possible solutions to settle it

Anonymous complaints or the ones that do not contain identification data of the complainant will not be taken into consideration and will be dismissed.

2. Provisions on the way of addressing the complaints, of settlement and communication of replies:

- 2.1. Any investor in the entities managed by the I.M. may file complaints for free. Information on the procedure relating to settlement of complaints received from investors are made available free of charge at the headquarters of the I.M. and on the I.M. website. Complaints may be submitted at the headquarters of the I.M. through the following channels: mail, fax, courier, directly to the general registry of the registered office of the I.M., email at the general address of the I.M. or sent to the address of the managed entity.

- 2.2. Registering complaints received in writing at the I.M. registered office during working hours can be done immediately, and if the complaint is submitted outside I.M.'s business hours, their registration is made on the next business day.
- 2.3. Communication of replies will be done in writing, by transmission to the home / office address found within the complaint or depending on the way of communicating the complaint at the I.M. headquarters, through other communication channels.
- 2.4. In order to settle amicably the complaint, the I.M. may use alternative methods of dispute resolution provided by legal provisions in force.
- 2.5. The I.M. makes permanently available to the public at its headquarters and on its website, the procedures to settle complaints, the contact details necessary for requesting information on the status of the complaints and the procedures for alternative dispute resolution provided by the legislation in force.

Single register of complaints

According to regulations, the I.M. owns and maintains at its headquarters a single register of complaints in secure electronic format, where all complaints are recorded chronologically, in the order received, and the status, date and their settlement method and must contain at least the following information:

- (i) complaint number;
- (ii) complaint date;
- (iii) the identity of the complainant, including address, phone number, e-mail and service/activity to which it refers;
- (iv) the name, surname and title of the person within the entity against which the complainant was submitted or to whom the complainant for the respective service/activity;
- (v) subject of the complaint;
- (vi) status of the complaint;
- (vii) date and settlement method of the complaint;
- (viii) reason why the complaint was not favourably settled (if applicable);
- (ix) the loss alleged by the complainant (if applicable);
- (x) observations;

Description of the procedure

1. There can be considered as complaints documents that:
 - Comply with the conditions related to the form and content stipulated by regulations in force;
 - refer to the service/activity performed within the category of the ones supervised by the FSA;
 - the subject of the complaint comprises the description of the facts;
2. Investors' complaints are registered in the single register of complaints, in chronological, secure and electronic format, in the order of receipt;
3. The I.M, by its department in charge with investors relations, will perform the following activities for compiling the responses and issuing the measures for complaints' settlement:
 - i. collect all relevant information, including the ones from the complainant, where necessary and possible;
 - ii. putting all efforts in order to solve the complaints amicably, as appropriate:
 - contacting the complainant to obtain additional information that could result in an amicable settlement of the complaint in question
 - providing explanations to the complainant, based on the information obtained, on the reasons behind the situation that was the subject of the complaint, etc.;
 - iii. immediate information in writing of the complainant in case the issues mentioned in the complaint need further research, on the reasons of delaying the answer. The Complainant will be informed on the term of solving the complaint, which can not be longer than 15 days as of the 30 days of registering the complaint.

- iv. In case of taking a final decision that is not an answer to or is in contradiction with the complainant's request, the I.M. must sustain in written its point of view and inform the complainant regarding his/her right to address the issue to the competent authorities and to use the methods of amicable setting litigation ways as provided by legal stipulations in force.
4. In case of taking a final solution that is favourable to the complainant and the answer is according to the complainant's request, the issue will be investigated and, if the case may be, an adequate measures plan will be adopted and implemented by the I.M. in order to remedy the deficiencies found.
5. The answers to complaints will be sent in written by sending them to the domicile/headquarters address mentioned in the complaint or, depending on the way of communicating the complaint to the M.I.'s headquarters, through other channels of communication.
6. The complaints, together with related answers, as well as the proof of communicating the answer to the complainant, will be archived and kept at the M.I.'s headquarters for a period of five years since the registration of the complaint.
7. All registrations in the Complaints Sole Registry made within a calendar year and the centralized total of complaints will be kept by the M.I. for a period of five years since the initial submission of the complaint.

SIF MUNTENIA SA
Through its Administrator
SAI MUNTENIA INVEST SA

President of the Board of Administrators
FLORICA TRANDAFIR