

Complaints Handling Procedure

CATACAP
BEYOND CAPITAL



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COMPLAINTS HANDLING PROCEDURE

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1 BACKGROUND AND PURPOSE

CataCap Management A/S (“**CCM**”) is an alternative investment fund manager based in Copenhagen. CCM manages private equity funds which invest (directly or indirectly) in equity or securities giving access to equity in small and medium-sized companies located in Denmark and adjacent markets.

This procedure for complaints handling (the “**Procedure**”) is adopted to ensure that CCM is compliant with the regulation on the AIFM’s handling of complaints and appointment of a complaint responsible. The Procedure sets out the processes which CCM has established for its handling of Complaints (as defined below) covered by the scope of this Procedure, including roles and responsibilities.

2 DEFINITIONS

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

“AIFs”	means the alternative investment funds managed by CCM from time to time;
“Board of Directors”	means the board of directors of CCM as registered with the Danish Business Authority from time-to-time;
“Board of Management”	means the board of management of CCM as registered with the Danish Business Authority from time-to-time;
“Business Day”	a day (not being a Saturday or Sunday) when banks are generally open for non-automated business in Denmark;
“CCM”	means CataCap Management A/S, CVR no. 33589913;
“Complaint”	means a statement of dissatisfaction addressed to CCM 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;
“Complainant”	means a natural or legal person who is presumed to be eligible to make a Complaint through having a retail customer relationship with CCM;
“Complaints Responsible Person”	means the person appointed by the Board of Management to handle Complaints in accordance with this Procedure;
“Compliance”	means Deloitte Statsautoriseret Revisionspartnerselskab to which the Board of Directors has decided to delegate the tasks within the compliance function as set out in the outsourcing agreement between CCM and Deloitte and this Policy adapted

by CCM from time to time;

“Compliance Officer”

means the compliance officer appointed by the Board of Directors pursuant to the compliance policy adapted by CCM from time to time; and

“Danish FSA”

means the Danish Financial Supervisory Authority (in Danish: Finanstilsynet).

3 SCOPE

This Procedure only applies to Complaints concerning CCM’s retail customer relationships as set out in Executive Order no. 1558 of 6 December 2024 on the complaint responsible and financial institution’s handling of complaints, section 1(2) (the “**Executive Order**”), to the extent this apply to CCM.

This includes, without limitation, any requirement for CCM to provide key information documents regarding units in AIFs which constitute a packaged retail investment product (PRIIP) 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**”).

CCM 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, CCM 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 Danish AIFM Act) i.e., CCM will only have retail customer relationships where it offers units in AIFs to semi-professional investors who is regarded as retail customers in relation to this Procedure.

4 DIVISION OF RESPONSIBILITIES

The Board of Management is overall responsible for the adequate implementation and monitoring of CCM’s compliance with this Procedure.

The Board of Management has appointed the Compliance Officer as the person responsible for CCM’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

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 employee/partner within CCM receiving a complaint to settle the relevant issue.

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. CCM shall in

connection with acknowledging its receipt of a Complaint provide the Complainant with information regarding the expected process for CCM's handling of the Complaint.

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 CCM's investigation of the matter is likely to be completed.

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 CCM'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

CCM shall, on request, or when acknowledging its receipt of a Complaint, provide written information regarding its complaints-handling process. CCM shall publish details on its complaints-handling process in an easily accessible on its website <https://www.catacap.dk/> providing clear and accurate information on CCM's complaints-handling process, including details on how to complain and to whom (the Complaints Responsible Person).

Please refer to: <https://www.catacap.dk/complaints/>

7 REGISTRATION OF COMPLAINTS AND FOLLOW-UP ON COMPLAINTS HANDLING

The Complaints Responsible Person shall register all received Complaints in a list in accordance with Appendix 1 (corresponding to Annex IV to the Danish FSA's guidelines to the Executive Order). The Appendix will be filled out in years where Complaints are received. Such registrations shall include a specification of the scope, status and outcome of any Complaint.

The Complaints Responsible Person shall, on an ongoing basis, analyze the data regarding CCM's handling of Complaints with the aim of ensuring that CCM 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

CCM shall, upon request from the Danish FSA, report necessary information concerning Complaints to the Danish FSA.

CCM's back office service provider, Apex Fund Service (Denmark) ApS, is responsible for any reporting to the Danish FSA in close collaboration with the Board of Management and the Compliance Officer.

9 REVIEW AND APPROVAL

The Board of Management shall at least annually review, and where relevant amend, and approve this procedure based on input from the Complaints Responsible Person.

This Procedure was approved by the Board of Management on 28 February 2025.

Approval history:

Version:	Effective from:	Changes:	Edited by:	Approved by:
1	7 January 2022			Board of Management
2	1 June 2023	Yearly review – minor amendments	Compliance Officer	Board of Management
3	30 August 2024	Yearly review - minor amendments	Mathias Kordif	Board of Management
4	28 February 2025	Yearly review (updated executive order)	Compliance Officer	Board of Management

APPENDIX 1 – FORM FOR REGISTRATION OF COMPLAINTS

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