

### **Instructions for complaint handling**

Updated 30 November 2015

This instruction applies to handling complaints from all customers of Arctic Securities AS (“Arctic”).

Complaints are to be made in writing to the Compliance Officer. If a customer makes an oral complaint, the customer shall be informed that only written complaints can be handled. If the customer needs help to draw up a written complaint, the Compliance Officer may help. On request Arctic shall give the customer written information on its complaints handling routines, with information as to how one can complain.

The person receiving the complaint must present the complaint to the Compliance Officer without undue delay. The Compliance Officer shall ensure that all complaints are thoroughly investigated and that any conflicts of interest are identified and limited. The Compliance Officer shall determine without undue delay how the complaint is to be handled.

The customer is to be given a written response without undue delay that states, as a minimum, that the complaint has been received, that it is under consideration, the expected processing time and that the customer will be given a written report from Arctic as soon as the complaint has been dealt with.

In handling complaints Arctic will:

- Obtain all relevant information and carry out an overall assessment of the complaint.
- Communicate with the complainant in clear and precise language.
- Answer the complaint without undue delay. If an answer cannot be given within the expected processing time, Arctic is to inform the complainant as to the reason for this and when the matter is expected to be concluded.
- Decisions that do not fully uphold the customer’s complaint are to be explained in writing, as well as providing the customer with information on the possibility to take the case to the Securities Dealers’ Association's Ethical Council.

The Compliance Officer shall ensure that the result of the Arctic’s internal investigations are recorded in writing, dated and stored by the person responsible for carrying out the interview/investigation. The entire chain of correspondence connected with the individual complaint (the complaint, confirmation of receipt of the complaint, internal assessments etc., as well as the final response to the customer and any follow up correspondence) is to be archived for at least 5 years. All customer complaints are to be registered in a separate register.

The Compliance Officer shall analyse information that is received in complaints on an ongoing basis in order to check whether the complaints are due to systematic or fundamental problems in Arctic.

Arctic shall report annually to the Financial Supervisory Authority with respect to customer complaints. Reporting shall cover the number of complaints received, the result of complaint handling and matters referred to the complaints appeals body.

The complaint handling routines are to be publicly available on [www.arcticsec.no](http://www.arcticsec.no).