



European Merchant Bank UAB

Customers Complaints Handling Policy

Contents

I. INTRODUCTION	1
II. COMPLAINTS MANAGER	1
III. HANDLING OF CUSTOMER COMPLAINTS	1
IV. COMPENSATION LEVELS.....	3
V. INFORMATION BETWEEN UNITS	3
IV. CHANNEL OF INFORMATION TO CUSTOMERS	3
IV. REGISTRATION, ANALYSIS AND REPORTING	4

I. INTRODUCTION

1.1. "Customer complaint" means a written request addressed to EMBank stating that a customer's (Client's) rights or legitimate interests have been violated in relation to the services provided or contracts concluded by EMBank and requesting that the customer's claims be met. EMBank must accept all complaints submitted to it by applicants (including, but not limited to, through a duly authorized third party).

1.2. This instruction regulates the handling of customer complaints within EMBank. When managing complaints, EMBank employees must follow the principles of GDPR, respect for human rights, justice, fairness, reasonableness, objectivity, impartiality and efficiency. Communication with the applicant must be clear and comprehensible.

1.3. This instruction is subject to annual review. A review should also be made earlier if a material change occurs.

1.4. This instruction must comply with The Rules for Examining Complaints Received by Financial Market Participants, approved by the Board of the Bank of Lithuania in 2013, June 6 by Resolution No. 03-105 (with subsequent amendments) - hereinafter referred to as the Resolution, Law on Payments of the Republic of Lithuania, and other legal acts of the Republic of Lithuania.

1.5. Complaints shall be examined in Lithuanian or in English, if so agreed between the Client and the EMBank.

1.6. All the Complaints shall be registered and examined in the manner set out in the Resolution, Law on Payments, or other legal acts of the Republic of Lithuania.

1.7. Conflicts of interest must be avoided and all necessary measures must be taken to identify and eliminate conflicts of interest.

1.8. This policy comes into effect with approval of Management Board.

II. COMPLAINTS MANAGER

2.1. Complaints Manager in EMBank is After Sales and Complaints Manager. In the absence of this person or when this position is vacant, Head of related Sales department (Local Sales Department for local clients and Global Sales Department for clients out of Baltic region) is in charge of this role.

III. HANDLING OF CUSTOMER COMPLAINTS

3.1. Customer complaints shall be handled promptly as soon as possible as described in the Resolution, wherever possible within 5 business days. Where this is not possible, the customer shall immediately be informed how the complaint will be handled. Complaints related to monetary loss (or potential of future monetary loss), complaints related to the Client's inability to fulfill its obligations to third parties or to EMBank, complaints related to the requirement to provide information promptly or to perform EMBank actions urgently, and similar cases - must be resolved as soon as possible.

3.2. Within 15 business days, the customer should have been notified with a decision on the customer complaint. The applicant's complaint will be examined and a response will be provided as soon as possible, but no later than within 30 calendar days from the date of receipt of the complaint. In

exceptional cases where the complaint cannot be examined within the period specified in this paragraph, the person authorized by the EMBank must notify the applicant thereof, indicate the circumstances of the delay in replying and the deadline by which the complaint will be examined.

3.3. The reply provided to the applicant when his / her complaint is rejected or partially satisfied shall state the reasons for the refusal to satisfy the complaint, indicate other means of protection of the interests of the applicant, including but not limited to possible means of dispute settlement and courts.

3.4. In case if the Customer is a consumer, EMBank must provide information that if the response of the EMB does not satisfy the applicant, who can be considered as the consumer in line with the legal acts (hereinafter referred to as the Consumer), or if the Consumer did not receive the response within 15 (fifteen) business days, the Consumer shall have the right to address the Bank of Lithuania, address: Žalgirio g. 90, LT-09303, Vilnius, Internet website www.lb.lt., regarding the activities of the Financial Market Participant, which are supervised by the Bank of Lithuania, within 1 (one) year as of the date the Consumer addressed the Financial Market Participant regarding the extra-judicial claim handling in line with the procedure specified in the legal acts of the Bank of Lithuania. The requirements for the claim and the submission procedure are stipulated in the Republic of Lithuania Law on the Bank of Lithuania. More information can be found here: <https://www.lb.lt/lt/vartotoju-ir-finansu-rinkos-dalyviu-gincai>.

3.5 Accordingly, where appropriate, EMBank must provide other information to the applicant that:

3.5.1. The entity of extra-judicial settlement of disputes between consumers and Financial Market Participants, which are not related to financial services, is the State Consumer Rights Protection Authority, address Vilniaus g. 25, LT-01402, Vilnius, internet website: www.vvtat.lt. The requirements for the claim and the submission procedure are stipulated in the Republic of Lithuania Law on Consumer Right Protection.

3.5.2. The entity of extra-judicial settlement of disputes regarding and (or) protection of privacy is the State Data Protection Inspectorate, address L. Sapiegos g. 17, 10312 Vilnius, internet website www.ada.lt. The requirements for the claim and the submission procedure are stipulated in the Republic of Lithuania Law on Legal Protection of Personal Data.

3.5.3. Other rights of the applicant, who is considered to be a Consumer as defined in the legal acts of the Republic of Lithuania, and measures of protection of allegedly violated rights and interests protected by the law, as well as institutions of extra-judicial settlement of consumer disputes are specified in the Republic of Lithuania Law on Consumer Rights Protection.

3.6. If EMBank is not responsible for the performance of the activity specified in the applicant's complaint, EMBank must respond to the applicant, stating the reasons for refusing to accept and examine the complaint, and, if possible, indicating to the applicant the financial market participant responsible for handling his complaint.

3.7. Complaints shall be handled quickly, efficiently, professionally and fairly. All employees must use the personal data and other information provided by the applicant in accordance with the requirements established by legal acts.

3.8. All customers shall have the right to address a complaint without any fee or commission being charged.

3.9. At the request of the applicant, the EMBank must provide him / her in writing with the information specified in Resolution and other information required by the applicant in connection with the complaint management process:

- the information that the applicant must provide in the complaint,
- the contact details of the person or department to whom the complaint is to be submitted,
- the time limit within which the financial market participant must examine the complaint,
- information on the possibility for the applicant to lodge a complaint with the competent complaints body.

3.10 The following data must be indicated in the complaint:

- Name, surname/company name.
- Date of birth or personal number/company identification number of a natural person or a legal entity, whose rights have been violated.
- Name, surname, personal number or date of birth, address and other data of the person, who has submitted the claim, for the purposes of communication (contact address, if it does not coincide with the residential address, telephone number).
- Date of execution and the reasons for addressing the EMB (which rights and contracts have been violated) and the grounds of the violation, as well as the ways to eliminate the violation.
- Documents evidencing the specified circumstances must be attached. If the circumstances specified in the claim are related to a concrete contract concluded with the EMB, the date and/or the number of the contract.
- The method of submission of the response.

3.11 The information specified in Clause 3.9 must be published on the EMBank website. After-Sales Manager is responsible for publishing of full and up-to-date data on EMBank web site relatd to customer complaints and related regulatory requirements.

IV. COMPENSATION LEVELS

4.1. All the compensation should be approved by CEO or Management Board or Supervisory Board according to the authorizations on expenses.

Ü

V. INFORMATION BETWEEN UNITS

5.1. All complaints, irrespective of the channel they are received by EMBank, shall be immediately forwarded to Complaints Manager.

5.2. Complaints Manager should inform Sales manager and the units that are mentioned within the complaint.

5.3. If the Complaint is more complex and/or related to request of material compensation (exceeds 1000 EUR), or has parallel complaint in regulatory authorities, the Legal department should provide their opinion as well as prepare the answer to the customer.

5.4. If a decision of EMBank is not meeting the Customer' request, the customer shall be informed in writing of the decision and the reasons for the decision.

VI. CHANNEL OF INFORMATION TO CUSTOMERS

6.1. Customers are informed in the same way they have sent the complaint to EMBank or the way they instructed EMBank to respond to.

VII. REGISTRATION, ANALYSIS AND REPORTING

7.1. All the Complaints shall be registered in the manner set out in the Resolution in EMBank folder: General Documents / Client Complaints. It is necessary to collect all documents and data related to the specific complaint and to store information on the measures taken to resolve the complaint. This folder must contain the following data confirming the complaint:

7.1.1 The name of the applicant,

7.1.2. The address of the applicant indicated in the complaint,

7.1.3. The date and method of receipt of the complaint,

7.1.4. The essence of the complaint (short content),

7.1.5. The services or products of the financial market participant complained of, their types,

7.1.6. The date of the reply to the applicant,

7.1.7. The final outcome of the complaint (decision).

7.2. The Complaints Manager with Risk Manager and Internal Control Officer (Compliance Officer) must permanently evaluate the results of the handling of complaints and submit this assessment (including summary of complaints) to the Management Board at least annually. Such evaluation must be done according to Resolution, other legal acts and internal policies of the Bank.

7.3. In order to identify its shortcomings and potential legal or operational risks, the Complaints Manager with Risk Manager and Internal Control (Compliance) Officer must regularly assess the outcome of the complaint handling process. During this assessment, the Complaints Manager with Risk Manager and Internal Control Officer must:

7.3.1. Collect information on similar complaints related to a particular service or product, perform an analysis of this information in order to determine the root cause of the complaints, as well as set priorities for elimination of the causes.

7.3.2. Assess whether the root cause of certain complaints may lead to complaints about other services or products.

7.3.3. Assess whether the root causes of the complaints can be remedied and identify ways to address them.

7.3.4. If necessary, eliminate the identified root causes of complaints.

7.3.5. Ensure that information on recurring or systemic reasons for complaints is provided to the Management Board of EMBank on a regular basis to enable them to carry out their functions effectively.

7.4. In order to identify potential legal or operational risks, the EMBank must regularly assess the outcome of the complaint handling process. During this assessment, EMBank must follow the procedure set out in the Resolution.

7.5. The register of complaints must contain the data confirming the complaint, which is specified in the Resolution.

7.6. The EMBank must keep the applicants' complaints, the material related to their examination, the document indicating the specific result of the examination of the complaint and the reply provided to the applicant for at least 3 years from the date of the final reply to the applicant. In addition, the EMBank must keep information on the decisions of managers regarding the elimination of operational deficiencies identified on the basis of complaints and risk management for at least 3 years.

7.7. The Complaints Manager must submit the report and information specified in the Resolution to the Bank of Lithuania by electronic means no later than within 2 months after the end of the calendar year. Also (as specified in Resolution) Complaints Manager must submit information on the evaluation of the outcome of the complaints received by the EMBank in accordance with the Resolution. This information includes the decisions made (planned) on the elimination of operational deficiencies and risk management identified on the basis of complaints, as well as a copy of the material provided to the Management Board on the analysis of complaints received during the reporting period. If the assessment of the outcome of the complaints procedure has not revealed any shortcomings in the performance, a notification must be provided. These actions must be performed by the Complaints Manager in accordance with the Resolution and must be reviewed by the Risk Department, Internal Control Department, Legal Department and approved in the Management Board.

7.8. EMBank (Complaints Manager) must also collect, at the request of the Bank of Lithuania, information on the number of complaints received, broken down by reasons for submission and results of investigations (complaints received, complaints investigated, complaints satisfied, complaints partially satisfied).

7.9. Example of a report, which must be submitted to the Bank of Lithuania in accordance with the Resolution (it should be noted that other information specified in the Resolution must be also provided):

Finansų rinkos dalyvių gaunamų
skundų nagrinėjimo taisyklių
3 priedas

DUOMENYS APIE GAUTUS SKUNDUS DĖL BANKO TEIKIAMŲ PASLAUGŲ

1. Duomenys apie finansų rinkos dalyvį

Juridinio asmens pavadinimas	
---------------------------------	--

**EMBANK****2. Ataskaitinis laikotarpis** m.**3. Bendras gautų skundų skaičius per ataskaitinį laikotarpį, vnt.****4. Per ataskaitinį laikotarpį gautų skundų dėl banko teikiamų paslaugų struktūra**

Eil. nr.	Teikiamos paslaugos	Gauta skundų, vnt.	Išnagrinėta skundų, vnt.	Patenkinta skundų, vnt.	Iš dalies patenkinta skundų, vnt.
1.	Banko sąskaitos				
2.	Būsto paskolos				
3.	Vartojimo kreditai				
4.	Taupymo produktai				
5.	Mokėjimo kortelės				
6.	Mokėjimo paslaugos				
7.	Elektroninės paslaugos				
8.	Kita				
IŠ VISO					

5. Finansų rinkos dalyvio per ataskaitinį laikotarpį gautų skundų pateikimo priežastys

Eil. nr.	Finansų rinkos dalyvio gautų skundų pateikimo priežastis	Gauta skundų, vnt.	Išnagrinėta skundų, vnt.	Patenkinta skundų, vnt.	Iš dalies patenkinta skundų, vnt.
1.	Banko sistemų techninės ar programavimo klaidos				
2.	Bankomatų veikla				
3.	Žmogiškasis faktorius (darbuotojų klaidos, jų neteisėti veiksmai ir pan.)				
4.	Banko sąskaitoms taikomi įkainiai, mokesčiai				
5.	Mokėjimo paslaugoms taikomi įkainiai, mokesčiai, baudos, palūkanos				
6.	Kitoms banko paslaugoms (išskyrus 4 ir 5 eilutėse nurodytas banko paslaugas) taikomi įkainiai, mokesčiai, baudos ir palūkanos				
7.	Banko produktų (paslaugų) kokybė				
8.	Neautorizuotos mokėjimo operacijos				
9.	Trečiosios šalies klaidos				
10.	Kita				
IŠ VISO					

(pareigos)

(parašas)

(vardas ir pavardė)