

Customers Complaints Handling Rules

Customers Complaints Handling Rules (hereinafter – the Rules) provide for the procedure for the handling of applicants' complaints by European Merchant Bank UAB (hereinafter – the Bank). This process is separate from inquiry handling and legal claims management processes. The following terms are used in the Rules:

“Customer” means a natural or legal person to whom the Bank provides financial services as well as credit administration services.

“Applicant” means a person who makes a written request to the Bank (*including, but not limited to, through a fully authorized third party*) that its rights or legitimate interests have been violated with respect to the services provided or agreements concluded by the Bank. Applicant can either be an existing/terminated customer of the Bank or it can refer to potential customers, as long as they are dissatisfied with some aspect of the Bank's services, even if they have not yet entered into a formal customer relationship. Therefore, the term “applicant” does not necessarily refer to account holders.

“Complaints” mean a written request addressed to the Bank stating that a customer's (*existing or terminated or potential*) rights or legitimate interests have been violated in relation to the services provided or contracts concluded by the Bank or any points of dissatisfaction and requesting that the applicant's requests be met. The Bank must accept all complaints submitted to it by applicants (including, but not limited to, through a duly authorized third party).

A complaint shall not include general inquiries, requests for information, service requests, or other communications that do not allege a violation of rights or legitimate interest.

The written complaint to the Bank can be , by e-mail, through the Bank's website or by personally delivering a letter to the Bank's office building to Office Manager.

Complaints can be submitted as follows:

- a signed Complaint to the address of the Bank's registered office at Gedimino ave. 35, Vilnius LT-01109, Lithuania,
- an electronically signed Complaint by e-mail to customercomplaints@em.bank, or
- by filling in the section <https://em.bank/customer-complaint-form/> “Customer Complaint Form” in web pages of the Bank that allow applicant to be properly identified and the fact of submission of information to be proven.

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 Bank (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 Bank, the date and/or the number of the contract.
- The preferred method of submission of the Bank response to the applicant.

The Complaint can be submitted in Lithuanian or English. Complaints shall be examined in Lithuanian or in English, if so agreed between the Applicant and the Bank. All responses to applicants shall be provided in clear, simple and understandable language.

The complaint shall be considered received on the date it is submitted to the Bank, and the examination period shall start from that date. Where additional information is required, the Bank may request it without unjustifiably delaying the examination. The Bank shall acknowledge receipt of the complaint without undue delay, unless a response to the complaint is provided within a short timeframe.

The Complaint will be examined within 15 (fifteen) business days from the date of receipt of the complaint (or submission of the revised information if such a request was made by the Bank and a response will be provided within same timeline). Where, due to reasons outside the Bank's control, the response cannot be submitted within 15 (fifteen) business days, a non-final response shall be submitted within this period. It will specify the reasons for the delay and the term before which the Applicant will receive the final response, which shall not exceed 35 (thirty-five) business days.

The reply provided to the applicant when the 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 recourse to courts.

All complaints shall be handled objectively and transparently within the framework of corporate ESG governance principles. In this framework, all communication with the applicants shall be coherent and transparent, fair, clear, and accurate.

All complaints shall be handled objectively, consistently, and transparently. The Bank shall ensure clear, fair, and accurate communication with applicants. Complaints shall be analysed on a regular basis to identify root causes, systemic issues, and potential legal or operational risks, and to implement appropriate corrective actions.

All responses to applicants shall be provided in clear, simple and understandable language. All applicants shall have the right to address a complaint without any fee or commission being charged.

Applicants are informed in the same way they have sent the complaint to the Bank or the way they instructed the Bank to respond to.

The Bank may refuse to examine a complaint only where the complaint is manifestly unfounded or where the Applicant cannot be identified after reasonable efforts, or where the complaint lacks essential information necessary for its examination. If the response of the Bank 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: Totorių g. 4, 01121, Vilnius, Internet website www.lb.lt, within 1 (one) year as of the date the Consumer addressed the Bank 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.

The entity of extra-judicial settlement of disputes between consumers and the Bank, 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.

In case any dispute arises in connection with the personal data security or data privacy, the State Data Protection Inspectorate is a body conducting extrajudicial proceedings (L. Sapiegos g. 17, 10312 Vilnius, <https://www.ada.lt>). In all cases, you can also defend your rights before the courts following the procedure established by acts of law.