

RULES FOR FILING AND INVESTIGATION OF COMPLAINTS

Transactive Systems UAB

R-08.11

2021

| | |
|----------------|--------------------|
| Approved by | CEO |
| Approved on | October 2021 |
| Document owner | Head of Compliance |
| Next review | Q4 2022 |

1 General Provisions

- 1.1 Transactive Systems UAB rules for filing and investigation of complaints (hereinafter – “the Rules”) are prepared in accordance with the Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania, as amended and Resolution No 03 – 105 “The Rules for the Handling of Complaints Received by the Financial Market Participants” of the Board of the Bank of Lithuania, as of 6 June 2013, as amended. The Rules also comply with other legal acts of the Republic of Lithuania, which regulate the obligation of a financial institution to take the necessary measures quickly and proportionately to protect the rights and assets of the Client.
- 1.2 The Rules set out the requirements for the completion and submission of complaints. This document also establishes the process and procedures followed by Transactive Systems UAB (hereinafter – “the Institution”) while investigating Client complaints about the financial services provided by the Institution.
- 1.3 In order to inform the Client of his right to defend his legitimate interests, the Rules are publicly available.

2 Terms and Definitions

- 2.1 **Institution** – “Transactive Systems, UAB” (legal entity code 304705758, registered office at Verkių str. 25C-1, Vilnius, the Republic of Lithuania).
- 2.2 **Client** – natural or legal person with whom the Institution has established a business relationship and has signed a cooperation and service agreement.
- 2.3 **Third party** – potential customer, Client’s client, or another entity that is not directly/indirectly related to the Institution or its Client.
- 2.4 **Complaint / Claim** – written information provided by the Client stating the circumstances in which the Client’s legitimate interests may have been harmed related to a service provided by the Institution and their request for satisfaction.
- 2.5 **Complaints Management** – the activities of the employees of the Institution in registering the complaint, conducting its investigation, and responding to the Client.
- 2.6 **Complaints Register** – a journal or log that records all incoming customer’s complaints or claims.
- 2.7 **Response to Complaint** – a written answer to a Client's complaint or claim.

3 Applicability

The provisions of this rule do not apply to:

- 3.1 the activity of the Institution which is not regulated by special laws or supervised by the Bank of Lithuania;
- 3.2 situations in which the Institution is not responsible for the execution of the activity indicated in the complaint.

4 Filing Complaints

- 4.1 The Client can submit a complaint in the following ways:
 - (i) by (physically) sending a letter by mail to Verkių str. 25C-1, LT-08223 Vilnius;
 - (ii) by sending an email to infovilnius@transactiveltd.com.
- 4.2 In the complaint, the Client (legal person or individual) must indicate:
 - (i) their full name;
 - (ii) their address (registered/residential/business);
 - (iii) the date the complaint is made;
 - (iv) the content of the complaint, i.e. the Client's rights or legitimate interests that have been violated;
 - (v) their specific request to or requirement of the Institution;
 - (vi) the complaint must be accompanied by information confirming the full facts of the damage (if applicable);
 - (vii) other information relating to the complaint, if needed (correspondence with law enforcement, payment order, account statement, etc.);
 - (viii) the complainant's contact details – at a minimum their email address;
 - (ix) if the complaint submitted by the Client is missing any of the above-mentioned information or if the complainant has insufficient information, or if further information is needed the Institution has the right to ask for additional information before examining the complaint.

5 Processing Complaints

- 5.1 Complaints received are recorded in the Institution's internal Register of Complaints.
- 5.2 The following information must be recorded in the complaint log:
 - the Client's full name;

- date and method of the receipt of the complaint;
- the name and position of the employee who has been assigned the complaint;
- the connection of the complaint with the services provided by the Institution;
- a summary of the complaint;
- the final decision of the employee, who examined the complaint;
- the date the response was sent to the customer.

5.3 The Institution has the right not to accept / examine the complaint, if:

- (i) the submitted complaint lacks the information specified in Paragraph 4.2 of these Rules;
- (ii) the complaint has already been responded to or is a repeat or duplication of a previous complaint. In such cases, once the Institution has responded to the original complaint, subsequent replies will only refer to the fact that a response has been sent;
- (iii) incomplete, unreadable or unclear information is provided in the claim. A responsible employee of the Institution must request the Client to clarify the information, if possible;
- (iv) the complainant is not a Client of the Institution.

5.4 Received complaints shall be examined in accordance with the law of the Republic of Lithuania.

5.5 Complaints are managed and replies shall be provided in accordance with the following sequence:

- (i) if the claimant is a Client, the Institution shall examine and answer the claim not later than within 20 days from the receipt of the complaint;
- (ii) if the claimant is not a Client, the Institution shall examine and answer the claim not later than within 30 calendar days from the receipt of the complaints (unless a different time limit is applied by mandatory legal acts);
- (iii) if the Institution cannot provide the full answer within above mentioned timeframe (20 or 30 days), the Institution shall provide a partial/initial reply, stating the reasons why the Institution is unable to respond to the complaint within the specified time limits. The Institution shall also indicate in such a response the deadline by which it will provide a complete response. Either way, the deadline for providing the final answer shall not exceed 45 days.

- 5.6 When the Complaint is examined, the decision as to its reasonableness shall be provided in writing.
- 5.7 The Institution could make a decision to:
- agree with the complaint;
 - partly agree with the complaint;
 - disagree with the complaint;
 - a neutral decision to the complaint (i. e. the claim is transferred to the Client; the claim is submitted to the wrong party; the claim specified in the complaint is resolved by the date of the response, etc.).
- 5.8 When a decision is made referred to in Paragraphs 5.7 of the Rules, the Institution shall state their specific arguments, as well other remedies, including but not limited to possible dispute resolution, and this shall be indicated in a response to the Client.
- 5.9 A response to the complainant shall be provided via the same channel the complaint has been received, unless otherwise indicated by the claimant.
- 5.10 All data related to the received / examined / answered complaint shall be stored for three years as from the date of the last response to the claimant. Data is processed according to the Law of the Republic of Lithuania on the Legal Protection of Personal Data and other applicable law.

6 Final Provisions

- 6.1 These Rules are publicly available on the Institution's web site at www.transactiveltd.com
- 6.2 If a Client is not satisfied with the decision made by the Institution, the Client shall have the right to use other legitimate remedies and to submit a complaint to the Bank of Lithuania, as stipulated by the Law on the Bank of Lithuania, the Law on Consumer Protection, and the Rules of the Procedure of Out of Court Settlement in the Bank of Lithuania of Disputes between Consumers and Financial Market Participants, approved by Resolution No. 03-11 of the Board of the Bank of Lithuania of 28 January 2016, as follows:
- Via the electronic dispute settlement facility E-Government Gateway;
 - By completing a [Consumer Application Form](#) and sending it to the Supervision Service of the Bank of Lithuania, Žirmūnų g. 151, LT-09128 Vilnius, email: frpt@lb.lt or info@lb.lt;

- By filing out a free-form application and sending it to the Supervision Service, Žirmūnų g. 151, LT-09128 Vilnius, email: frpt@lb.lt or info@lb.lt.
- 6.3 If the dispute is not settled amicably or through other means of out-of-court settlement of disputes, the dispute shall be resolved in court according to the law of the Republic of Lithuania.