

PROCEDURE FOR HANDLING OF COMPLAINTS

Approved by the Board of Directors. Valid from 01.01.2019

1. GENERAL PROVISIONS

The purpose of establishing the procedure for handling complaints and grievances is to ensure the fastest possible consideration and fair resolution of complaints made by clients of Baltic Finance Service Group OÜ (hereinafter BFSG), to cease violation of the client's rights if the reproaches contained in the complaint are justified, to restore the violated rights and to address the internal organisational shortcomings that caused the complaint. A complaint is a verbal or written grievance pointing to a fault in the BFSG's activities which is submitted to BFSG either with a claim against BFSG arising from the highlighted fault or without such a claim. SUBMISSION AND RECEIPT OF COMPLAINTS

- 2.1. Every BFSG's client has the right to make or submit complaints in a freely chosen form either personally or through an authorised representative.
- 2.2. If possible, the client service representative who takes a verbal complaint should find out the necessary details and resolve the complaint immediately in the client's presence. Where relevant, the employee should seek additional clarifications from the head of the corresponding structural unit.
- 2.3. If the questions posed by the client require additional checking or if the problem is outside the remit of the corresponding employee of the BFSG, the client should be asked to put his complaint in writing on the standard form adopted by the BFSG (Appendix 1). The form recommended to the client can be found on the [BFSG website](#).
- 2.4. When a complaint submitted in writing is received in the office of the BFSG the identity of the complainant should be verified in accordance with the procedural rules in place; a copy of the identity document should be made. If the complaint is made by a person who does not have a contractual relationship with the BFSG, written consent should be requested from him for the processing of his personal details.
- 2.5. The person taking the complaint should check whether the complaint states the complainant's name, date of birth or personal identification code and contact details and whether the documents relating to the complaint are enclosed.
- 2.6. Complaints taken in the BFSG's office shall be forwarded to the person responsible for their registration and handling no later than on the next day following the receipt of the complaint.
- 2.7. The BFSG's employee who has taken a written complaint shall provide the client with a notice confirming its receipt. Confirmation of receipt can also be made on the copy of the complaint which is returned to the person submitting the complaint.
- 2.8. Complaints submitted in writing or electronically (by means of a digitally signed e-mail) shall be forwarded by the person taking the complaint for registration pursuant to the procedure in place in the BFSG. Complaints received electronically shall be forwarded in electronic form.
- 2.9. The relevant employee of the BFSG shall register the complaint, put the date of receipt and a registration number on it and forward the complaint to the corresponding division head or department manager who will appoint a complaint handler.

3. HANDLING OF COMPLAINTS

- 3.1 The prerequisite for handling a complaint is the possibility to identify the person making the complaint. If the information presented in the complaint makes it impossible to identify the person, the complaint will not be considered. In the case of partial incompleteness of information, the complaint handler will invite the person making the complaint to the BFSG's office for identity verification and clarification of the facts and/or ask the person to provide the missing information additionally in writing.
- 3.2 The following is taken into account in handling a complaint:
 - 3.2.1 The person making a complaint and his assertions should be treated without any prejudice.
 - 3.2.2 The circumstances mentioned in the complaint should be investigated by the complaint handler with a thoroughness which would make it possible to reach the crux of the issue raised. Where necessary, the complaint handler will ask the person making the complaint to provide additional information necessary to resolve the complaint. The complaint handler has the right to hear the relevant persons and/or require them to provide clarifications in writing and to check the information contained in electronic databases. Where necessary, the complaint handler will involve specialists in the handling process, including employees of other departments and units.
 - 3.2.3 In clarifying the circumstances, the legality of what happened should be analysed in the light of relevant contracts, product manuals, standard terms and conditions and other guidelines in place in the BFSG. To assess the compliance with the legislation, the complaint handler will seek the assistance of a lawyer. As a result of the analysis, the complaint handler shall conclude whether the complaint is well-founded or not.
 - 3.2.4 The experience gained in resolving the complaint shall be made known to the employees of the BFSG to avoid similar problems in the future. If during the handling of a complaint faults in the BFSG's contract terms, operation regulating guidelines, programme or employees' knowledge are discovered, the complaint handler shall make a proposal to the management of the BFSG to address the faults or provide additional training to the employees.

4. REPLYING TO COMPLAINTS

- 4.1 The time limit for handling a complaint is ten (10) business days of its receipt. If the information collected over the said period of time is not sufficient to resolve the complaint, the client shall be sent a corresponding notice.
- 4.2 The reply to the complaint should be well-grounded, all arguments should be substantiated. If the reproaches are justified, the client's violated rights should be restored without delay. A reply sent to the client should contain an accurate and comprehensible justification for partial or full dismissal of the client's claims. The client should be provided with the information that is necessary in the context of protection of his economic interests.
- 4.3 The complaint handler shall clear the draft reply with the in-house lawyer and send the reply together with the materials collected to the appropriate person for signature. The signed reply will then be forwarded for registration and sending to the person who made the

