

PROCEDURE FOR RESOLUTION OF CLIENT COMPLAINTS

Effective as of 07 August 2017

1. GENERAL PURPOSE

- 1.1. The purpose of this Procedure for Resolution of Client Complaints (hereinafter the **Procedure**) is to regulate the procedure for resolution of client complaints in AS Redgate Capital and its subsidiaries (hereinafter jointly the **Company** or **Redgate Group**).
- 1.2. Client complaints must be handled in a transparent, efficient and systematic manner. Using the information obtained in the course of the complaints handling process, the Company strives to improve and upgrade the services provided and products offered as well as the internal rules to reduce the risks of the Company and improve the service quality, which, all in all, benefits both the Company and its clients.

1.3. Definitions:

- 1.3.1. **Client**, for the purposes of this Procedure, means every natural or legal person who uses, has used or has expressed their wish to use the services of the Company.
- 1.3.2. **Client Manager** means a person managing a specific client relationship. As a rule, the Client Manager is a project manager arranging the provision of the respective advisory service.
- 1.3.3. **Complaint**, for the purposes of this Procedure, means an oral or written expression of dissatisfaction by the Client regarding the Company's product or service conditions or the Company's conduct or obligation. Complaints include the following situations:
 - 1.3.3.1. dissatisfaction clearly expressed by the Client regarding the conduct of an employee of the Company (or, generally, regarding the Company);
 - 1.3.3.2. clear reference by the Client to a mistake made or an obligation not performed by the Company, incl. by an employee of the Company;
 - 1.3.3.3. dissatisfaction clearly expressed by the Client regarding the Company's service conditions.

The expression of dissatisfaction by the Client is not deemed to be clear is not handled as a Complaint if it has been submitted vaguely and expressed in a manner that makes it impossible to understand the nature of the mistake made by the Company or its employee, incl. mistake related to conduct, or the nature of an obligation that was not performed or the specific omission in the product/service conditions.

A proposal made by the Client for amendment of the conditions of a service by agreement of the Parties is not regarded as a Client Complaint.

2. RESOLUTION OF COMPLAINTS

- 2.1. Each Client is assigned a Client Manager (project manager) by the Company, who is responsible for the resolution of the Client Complaint and must arrange a timely and competent response to the Complaint. If the Client Manager has received information about the dissatisfaction of the Client, the Client Manager must assess and, where necessary, additionally clarify the circumstances to decide whether this is a Complaint. At the request of the Client, the Client is provided reasonable assistance in preparing

Complaints, which consists of the general guidelines given by the Client Manager regarding the structure of the Complaint.

- 2.2. If the expression of dissatisfaction by the Client is a Complaint, i.e. it is sufficiently specific and clear, the Client Manager ensures the provision of information about the schedule of the resolution of the Complaint to the Client.
- 2.3. In response to the Client Complaint, the Client Manager notifies the Client either in writing, orally or via another communication channel agreed with the Client of the following:
 - 2.3.1. acceptance of the Complaint for handling and the deadlines of handling; or
 - 2.3.2. refusal to accept the Complaint for handling along with the reasons for refusal. The refusal to accept the Complaint for handling must be reasonably justified and approved by a member of the management board of the Company.
- 2.4. All Complaints received by the Company from Clients are immediately transferred by the Client Manager to the management board and compliance manager. If the Complaint has been received by a person other than the Client Manager, the person must immediately transfer the Complaint to the Client Manager. If the Complaint has been filed against the actions of the Client Manager, the Complaint will be referred to the management board of the Company for resolution and the management board decides who will resolve the Complaint.
- 2.5. The Client Manager or the person appointed by the management board of the Company resolves the Complaint accepted for handling in cooperation with the legal adviser of the Company, approving the resolution with at least one member of the management board of the Company.
- 2.6. A written response is generally provided to a written Complaint of the Client (sent by e-mail, fax or mail) in the same format, unless an oral response is given to the written Complaint of the Client and there is a reason to presume that the Client does not want to receive a written response. Written responses to Complaints are signed by a member of the management board of the Company. Responses to be provided by e-mail may be sent by the Client Manager themselves and a copy of the response is sent to a member of the management board of the Company as well.

3. SCHEDULE FOR RESOLUTION OF COMPLAINTS

- 3.1. The Client Manager or a person appointed by the management board of the Company reviews the Complaint and notifies the Client, who is a natural person, of the possible resolution of the Complaint within fifteen (15) days and the Client, who is a legal entity, within thirty (30) days of the receipt of the Complaint. If the Complaint cannot be resolved within the aforementioned period of time because it is complicated or for other good reasons, the Client Manager or the person appointed by the management board of the Company notifies the Client of the reasons for extension of the term of handling the Complaint and additional term of response in a format that can be reproduced in writing after having approved the same with the management board.
- 3.2. If, as a final result of handling the Complaint, the Company disagrees with the Client or no compromise can be reached with the Client, the Company notifies the Client, if applicable considering the content of the dispute, of the possibilities of extra-judicial resolution of the Complaint or other possibilities for appeal in a format that can be reproduced in writing, adding the contact details of the body conducting proceedings.

4. REGISTRATION AND DOCUMENTATION OF COMPLAINTS

- 4.1. All communications related to the Complaint, incl. the response to the Complaint, are forwarded, in the course of the resolution of the Complaint, by the Client Manager or the person appointed by the management board of the Company to the compliance manager, who registers the Complaint and the measures taken to resolve it with the Complaints register maintained by the compliance manager. The compliance manager arranges the registration and documentation of Complaints in a manner that ensures the availability of Complaints, traceability of the course of handling and analysability of statistical data in the Company.
- 4.2. The documentation related to Complaints is retained by the Company for each Client throughout the Client relationship and for at least five (5) years after the expiry of the Client relationship.

5. FOLLOW-UP

- 5.1. The compliance manager submits the statistical data about the Complaints and the analysis drawn up on the basis thereof to the management board of the Company once a year.
- 5.2. The compliance manager systematically assesses the risks in the activities of the Company on the basis of the Complaints, collecting statistical data about Client Complaints and analysing the data periodically to identify potential problems in the Company and legal risks relating to products, services and servicing as well as omissions in internal rules and the awareness of managers and employees thereof, etc.
- 5.3. As a result of the follow-up, the management board of the Company may arrange amendments to internal rules; changes in products, services and servicing; organisation of additional internal training and other measures to eliminate omissions.