

Customer complaints management policy

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Recipients:

- Board of Directors
- Senior Management
- IT Officers
- Staff
- Outsourcing Providers

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1. Customer complaints

An oral or written expression of a Customer's dissatisfaction / complaint is due to a failure to meet his or her expectations of a service or product in the context of his or her in connection with the Foundation, which is associated with consumer disparity, damage or other harmful consequences. As a complaint, in no case is a Customer's request arising from the exercise of the Foundation's business policy, satisfied through specific procedures and managed exclusively by the Unit responsible for each Customer. Indicatively mentioned:

- Request for pricing policy
- Request for data (copies of document transactions, etc.)
- Transaction request

2. Reasons and Categories of Complaints

Indicatively, the following can be a cause for complaint:

- Inconsistency of terms between pre-contractual information and the actual execution of a transaction
- Insufficient, incomplete or incorrect information of the trader and creation of incorrect expectations.
- Possible errors in the execution of transactions, or the execution of customer orders and other manipulative errors.
- Delays or lower than the expected level of service
- Disagreement over the legality of terms of transactions or contracts
- Absence of Professional Staffing Behavior.

2.1 Complaints in writing

The complaints submitted by the customer through a letter, which is received via mail, fax, e-mail (email) are defined. The resolution of such complaints is completed in any case by means of a reply letter, which is sent to the customer.

2.2 Complaints orally

Complaints are defined which the customer submits orally and not through a written letter. These complaints are recorded, investigated and processed in the same way as in written complaints, with the only difference being that their resolution does not require written notice to the customer. They can also be solved by notifying the customer by phone, via a recorder and if the customer is informed that the conversation is being recorded. Then, each

category is analyzed according to the way and the reason for submitting the complaint (oral or written) and per product / service in order to be settled.

2.3 Complaints through Institutional and Legal Measures

Complaints received through Institutional Bodies (eg Central Bank of Cyprus, Ministry of Development, the Consumer Ombudsman, etc.) are defined and addressed by the Regulatory Compliance Officer. The resolution of such complaints shall be completed in any case by means of a reply letter, which shall be sent to the Agency.

3. Basic Principles and Complaints Management Tools

3.1 Support Department

If you feel that GPS - Global Payments Solutions Ltd have not met your expectations in the delivery of our Services, in the first instance contact the GPS - Global Payments Solutions Ltd using the contact email address for complaints support@transfermatch.eu.

The Support Department is responsible for handling customers' complaints. Particularly:

- The department must disclose its contact details, as well as the contact details of the relevant officials, as well as any changes that will occur to them, in the Bank of Lithuania or Central Bank of Ireland, notified to the Regulatory Compliance Unit.
- Defines in cooperation with the Regulatory Compliance Officer and the Legal Adviser the procedures for resolving complaints.
- Receives mail related to customer complaints
- It is responsible for archiving the Company's complaints. It maintains a special Complaints file, which complies with all the complaints submitted to the Company, with the following information:
 - The way it was submitted.
 - The initial information of the recipient of the complaint, to the Department that reports the data of the complaint.
 - The customer's letter (if it is a written complaint).
 - The corrective actions that may have been taken.
 - The final outcome (customer satisfaction, or not).
 - The response to the customer and / or the agency that mediated.
 - Any other information, or document used to investigate the case.

- If the customer's complaint letter has reached the Association of Institutional Bodies, the reply letter is also notified to the Regulatory Compliance Unit, in order for the latter to respond to the Agency.
- Monitors the process of resolving customer complaints, compliance with procedures and deadlines, until the final closure of cases. The Department will respond to your complaint in writing or using another Durable Medium within 15 (fifteen) Business Days after the receipt of complaint. In exceptional cases, due to reasons which are beyond its control, the Department may send you a preliminary response by indicating reasons for delay and the term by which you will receive its final response. In any case the term for provision of final response will not exceed 35 (thirty-five) Business Days after the receipt of complaint. Handling of complaints is free of charge. The claims shall be submitted, handled and responded to in English, unless use of another language is agreed between the customer and GPS – Global Payments Solutions Ltd.
- Collaborates and provides instructions on how to manage complaints to the involved operational units of the Foundation and, where necessary, coordinates actions to investigate and finalize complaints.
- Checks the answers and actions of those responsible for resolving the complaint that must be answered in writing. It compiles the reply letter to the customer, taking special care of the style and structure of the letter so that all the customer's questions / complaints have been answered in an understandable way. If she deems it appropriate, she cooperates with the Legal Adviser and the Head of Regulatory Compliance.
- Informs the Administration regarding the complaints received.
- Suggests improvement in areas where problems have been identified.
- Maintains a special Complaints Register, in which all complaints are registered by serial number, date and customer code (registry number). The Complaints Register includes, among other things, the date of submission of the complaint (opening date) as well as the date of informing the customer to resolve it (closing date). As soon as he is informed of the submission of a complaint, he opens a portion for it in the Complaints Archive and registers it in the Complaints Register, as "Open Complaint". Monitors all Open Complaints, in continuous reviews, Until these are resolved and the "Closed" indication is registered in the Register. It ensures that all the relevant units meet the deadlines for resolution and goes where it deems necessary.
- Should the customer has not been satisfied with GPS's final response, or should GPS – Global Payments Solutions Ltd fail to respond to the customer within 15 Business Days from receiving the claim, the customer shall have the right to apply

to the Bank of Lithuania, the FCA or the Central Bank of Ireland in three different ways: (1) through the electronic dispute settlement facility E-Government Gateway, (2) by completing a consumer application form and sending it to the Supervision Service of the Bank of Lithuania at Žalgirio str. 90, LT-09303 Vilnius, email: frpt@lb.lt or to the Supervision Service of the CBI at N Wall Quay, North Dock, Dublin, D01 F7X3 email: enquiries@centralbank.ie, or (3) by filling out a free-form application and sending it to the Supervision Service of the Bank of Lithuania, Žalgirio str. 90, LT-09303 Vilnius, email: frpt@lb.lt or to the Supervision Service of the CBI at N Wall Quay, North Dock, Dublin, D01 F7X3 email: enquiries@centralbank.ie. Whichever way the customer chooses to submit the claim, it must be in the official language of the country, i.e. Lithuanian or English. The customer may only apply to the Bank of Lithuania or the CBI within 1 year after he received from GPS a response that is not satisfactory, or after the 15 Business Days for responding has passed and GPS did not respond. Addressing GPS first is a precondition for the customer applying to the Bank of Lithuania or the CBI. The decision of the Bank of Lithuania or the CBI is not mandatory for GPS or the customer and the customer, even after the dispute was solved by the Bank of Lithuania or the CBI, shall have a right to apply to the court.

- In case the customer generally is not satisfied with GPS - Global Payments Solutions Ltd or its services, where there is no claim or disagreement between the customer and GPS - Global Payments Solutions Ltd, the customer may always approach the Bank of Lithuania, the FCA or the CBI by addressing a complaint to the Bank of Lithuania at Totorių str. 4, LT-01121 Vilnius, email: info@lb.lt, or to the Supervision Service of the Bank of Lithuania, Žalgirio str. 90, LT-09303 Vilnius, email: frpt@lb.lt or to the Supervision Service of the CBI at N Wall Quay, North Dock, Dublin, D01 F7X3 email: enquiries@centralbank.ie.
- If you are unhappy with either our updated or final response, you may contact the European Ombudsman Service, an independent and impartial service that looks to settle disputes between financial services firms and their customers. Please note, however, that the European Ombudsman Service will not be able to help you with your complaint until our complaint's procedure has been exhausted. We will of course aim to resolve your complaint quickly and efficiently and will begin our investigation immediately.

3.2 Regulatory compliance

The Head of Regulatory Compliance receives the cases of complaints through the Institutional Bodies, for the investigation and resolution of which he directly cooperates with the Support Department. The reply letter to the respective Institutional Body is drawn up by the Head of Regulatory Compliance, audited by the

Legal Adviser and finally sent to the Institutional Body by the Head of Regulatory Compliance. The Support Department receives a copy of the case in order to have a complete picture of the complaints submitted to the Company.

It is noted that at the beginning of each year, the Regulatory Compliance Officer with the Bank of Lithuania, the FCA or the CBI sends the annual complaint report, which shows all the incoming complaints of the previous year and their analysis by category, their resolution time and number. cases that are ongoing and have not been resolved.

In addition, he gives an opinion on the Company's reply letters to the customers, when requested.

3.3 Counsel

- Gives an opinion during the management of the case and approves from a legal point of view the draft of the reply letter where it is deemed necessary.
- Depending on the cause or severity of the complaint, he may write the entire reply letter.
- Collaborates with the Support Department in the investigation of complaints cases with legal measures (out of court) and prepares the relevant response.
- Presents at meetings with the competent bodies for out-of-court settlement of complaints, if necessary.

3.4 Statistics

The Support Department issues the Annual Complaints Report, which it sends to the Regulatory Compliance Officer for review, in order to be forwarded to the Bank of Lithuania or the CBI. This report includes the following information:

- Complaints Number per Complaint Category
- Complaints Solution Time Analysis, In the following data:
 - Average Time (days)
 - Maximum Time (days)
 - Minimum Time (days)
- Number of Programs in Evolution (ie cases that have not yet been resolved)