COMPLAIN HANDLING AND MONITORING POLICY PALADIS FINANCE UAB

At Paladis Finance UAB, we are dedicated to providing excellent services to our customers. However, we understand that there may be instances where our customers are dissatisfied and wish to make a complaint. This policy outlines the procedures for handling and resolving complaints in accordance with UK and EEA laws applicable to Electronic Money Institutions.

Definitions:

"Complaint" refers to any expression of dissatisfaction made by a customer or any person authorized to act on their behalf, regarding the services provided by Paladis Finance UAB as an Electronic Money Institution.

Objectives:

Our primary objectives in handling complaints are to:
a) Provide a fair and transparent process for resolving customer complaints.
b) Respond promptly and effectively to complaints.
c) Learn from complaints and take appropriate steps to improve our services.
d) Ensure customers' rights are protected in accordance with relevant laws and regulations applicable to Electronic Money Institutions.

Scope:

This policy applies to all complaints received by Paladis Finance UAB in relation to the services provided by our institution as an Electronic Money Institution.

Introduction of Paladis Finance UAB:

Paladis Finance UAB, a modern Fintech company, serving both individual/personal and business customers from all over the World; however, the business focus shall initial be in Lithuania and Lichenstein. Paladis strives to offer its customers a constantly growing ecosystem of value added services for innovative digital payments: Online, at the point of sale and entirely mobile.

This procedure describes the steps to be followed by Customer Support representatives in processing complaints from eligible clients of UAB Paladis Finance.

In essence, a complaint is any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a complainant about UAB Paladis Finance's provision of, or failure to provide, a financial service which:

(a) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and

(b) relates to an activity of UAB Paladis Finance, or of another *respondent* with whom UAB Paladis Finance has some connection in marketing or providing financial services or products which comes under the jurisdiction of:
The Financial Ombudsman Service
Exchange Tower
London, E14 9SR
www.financial-ombudsman.org.uk
Telephone (local): 0300 123 9 123
Telephone (abroad): +44 20 7964 0500
Monday to Friday 8am to 8pm
Saturday, 9am to 1pm

In most cases a complaint will be identified by the Customer Support through its daily interactions with a customer, which maybe through any form of media. A complaint may also be identified as a result of a referral from another myPOS area.

Any UAB Paladis Finance customer is able to make a complaint free of charge. Complaints can be received via any of the following channels served by the Customer Support representatives:

- E-mail (The whole list of emails through which a client can contact is available in Appendix 1)
- Contact form on the website www.paladis.com

Every customer complaint received is recorded in Microsoft Outlook and on our Mail-Server.

Upon receipt of a complaint, the following steps are followed:

1. **Complaint is registered** in Internal System

2. **Summary resolution communication** is sent to the Complainant if the complaint is resolved by the close of the 3rd business day after the day on which is received. If not – proceed with Step 3.

3. **Acknowledgment letter** is sent to the Complainant by the close of the 4th day after the day on which the complaint was received. In case of security-related complaints, the acknowledgment notice is sent by the end of the business day in which the complaint is received or by the end of the following business day, in case the compliant is received during a non-working day.

4. **Letter of update** is sent to the Complainant during the period of reviewing the complaint (generally this is between the 4th and the 14th business day after the day on which UAB Paladis Finance received the complaint. The letter of update is to ensure the Complainant is kept informed of progress on the measures being taken to resolve the complaint.

5. **Holding response** is sent to the Complainant if complaint resolution takes longer than expected and previously communicated and complaint is not solved by the end of 15 business days after the day on which it is received.

6. **Final response** is sent to the Complainant by the end of 15 business days after the day on which UAB Paladis Finance received the payment related complaint. In exceptional circumstances, if a final response cannot be given in accordance with this time frame, then a final response must be sent to the Complainant by the end of 35 business days after the day on which UAB Paladis Finance received the payment related complaint and for all other complaints, up to 8 weeks.

Complaints must be kept and stored in the relevant client's file on the cloud drive.

All phone recordings and e-mail communication with the Complainant are saved in Microsoft Outlook and on our Mail-Server.

The Compliance department and senior management of UAB Paladis Finance have full access to the Complaints section.

DEFINITIONS

- **Complaint** - is "any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the firm's provision of, or failure to provide, a financial services activity".
- **Eligible complainant** - a complaint made by a person eligible to have a complaint considered under the The Financial Ombudsman Service.
- **Payments related complaint** applies to a payment service user, and relates to anything to do with placing, amending or cancelling a payment order, making, executing or processing a payment, payment instruments and any related charges and information requirements, in accordance with their rights and obligations arising under the PSD2.
- **Complaints Register** – an electronic database, registering, keeping and storing all customer complaints, the respondent replies and the Summary Resolution Communications, part of myPOS Office application.
- **Refund request** – Request for reimbursement of a whole amount debited from the client's account.
- **Partial refund request** – Request for reimbursement of part of an amount debited from the client's account.
- **Customer Support Representative** - The employee working in the Customer Support Department whose main responsibility is to answer to all clients' requests received via different communication channels such as e-mail, phone, contact forms or chat support.

NORMATIVE DOCUMENTS
▪ PSD2 ▪ EBA Final Guidelines on the Security of Internet payments; Guideline 9 EBA ▪ EBA Guidelines on Incident Reporting ▪ EBA Regulatory Technical Standards on Secure Customer Authentication and Secure Communication

ADDRESSEES	
HEAD OFFICE	OFFICES
FOR EXECUTION	
• Customer Support (CS) Representatives • Operations Department Compliance Officer	• Customer Support (CS) Representatives • Operations Department Compliance Officer
FOR INFORMATION	
• Business Development • Head of Operations • Legal Department • Operations Department • Product Definition Department • Compliance Officer • IT department • Risk Department • Internal Audit department Distributors Team	

DESCRIPTION OF THE PROCESS

I. Complaints handling

UAB Paladis Finance is committed to being responsive to the needs and concerns of all customers or potential customers and to resolving all complaints as quickly as possible. Effective complaints handling is a key part of customer service excellence and UAB Paladis Finance ensures that complaints are taken seriously, and dealt with impartially, competently and diligently. Every received complaint is investigated objectively, impartially and with a balanced view of all information or evidence and the customer's interests are managed fairly during the complaint investigation process. Complaints are dealt with consistently, fairly and sensitively within clear time frames. UAB Paladis Finance handles complaints and provides consistent outcomes for all customers. UAB Paladis Finance has a culture of care and encouraging more customers to self-identify vulnerabilities through all stages of the customer journey, including when things go wrong. UAB Paladis Finance ensures that responds and treat appropriately to customers vulnerability with taking account of their individual needs and circumstances and exercise particular care with vulnerable consumers.

UAB Paladis Finance is committed to resolving customers or potential clients' issues at the first point of contact, however, sometimes this is not possible in all circumstances, in which case this formal complaint's process must be followed.

Regardless of the chosen communication channel, the CUSTOMER SUPPORT REPRESENTATIVE identifies the Complainant and makes sure all further correspondence related to the complaint is sent via his/her registered contact details (e-mail & phone). If the Complainant is a Potential client the CUSTOMER SUPPORT REPRESENTATIVE requests his/her preferred contact detail for further communication related to the complaint.

Customer Support Department works with Complainants to resolve their complaints quickly and wherever possible, within three (3) working days. When Customer Support Representative has received a complaint, the Complainant will receive a prompt acknowledgement in writing within three (3) business days of the day when the complaint was received, highlighting information pertinent to the complaint.

Once a complaint has been received Customer Support Representative will undertake an initial review of the complaint. CUSTOMER SUPPORT REPRESENTATIVE will keep the Complainant informed of progress with investigating the complaint, proposed actions and the expected timeframe for resolution.

If Customer Support Representative resolves a complaint within three (3) business days, Customer Support Representative will provide to the complainant with a written summary resolution which will contain details as to any findings UAB Paladis Finance has made as a result of its investigation into the complaint and whether any remedial action will be taken.

Within the written resolution UAB Paladis Finance will also provide details as to how the complainant can escalate the complaint to The Financial Ombudsman Service should the Complainant be dissatisfied with UAB Paladis Finance's resolution.

Customer Support Department endeavours to resolve all payments-related complaints and to issue a final response within fifteen (15) business days of receiving the complaint, but in exceptional circumstances, it could take up to a maximum of 35 working days for payments-related complaints and up to 8 weeks for all other complaints.

If the review exceeds fifteen (15) business days, a Customer Support Representative must contact the Complainant to inform the same for the reason for the delay, and to indicate when UAB Paladis Finance expects to be in a position to complete the review of the complaint.

Once Customer Support Department has fully investigated and reached a conclusion, a final response must be issued with an explanation of the assessment of the complaint to the Complainant, along with any remedial action or redress. The final response could be either upholding the complaint, and where appropriate, offering redress or providing the reason for rejecting the complaint. UAB Paladis Finance may also take measures to improve any systems or processes where necessary.

Customer Support Department aims to resolve all complaints fairly, however if a Complainant should not be satisfied with UAB Paladis Finance's final response or the Complainant doesn't hear from UAB Paladis Finance within the relevant time period, the Complainant may refer the complaint to The Financial Ombudsman Service (the "Ombudsman") for consideration. The Financial Ombudsman Service is a free, independent service in United Kingdom for settling disputes between financial services firms and their customers. Where the Complainant decides to refer the complaint to The Financial Ombudsman Service, the Complainant should do so within 6 months (from the date the final response was issued) as the complaint may otherwise be time-bared under the Ombudsman's rules.

The Ombudsman contact details are:

The Financial Ombudsman Service
Exchange Tower
London, E14 9SR
www.financial-ombudsman.org.uk
Telephone: 0300 123 9 123 local
Telephone: +44 20 7964 0500
Monday to Friday 8am to 8pm
Saturday, 9am to 1pm

Complainant could escalate the complaint to The Financial Ombudsman Service if:

- the subject matter that the Complainant is complaining about happened within the past 6 years.
- the complaint will be made no more than 3 years from when the Complainant became aware (or should have become aware) that he/she had a reason to complain.

Records of all complaints received including measures undertaken to resolve each complaint must be retained by UAB Paladis Finance for no less than five (5) years.

UAB Paladis Finance will hold personal data about the Complainant, which the individual provides, and which other people give in response to the complaint. UAB Paladis Finance will hold this data securely and only use it to address the complaint.

	Country	Help e-mails
General e-mail address	All countries	info@paladis.com
E-mail address for complaints submission only	All countries	complaints@paladis.com