

## 1. GENERAL PROVISIONS

- 1.1. The purpose of this Complaints Handling Procedure (the Procedure) of the Company is to give guidance to the Company's Employees on how to ensure that any Complaints received by the Company are dealt with appropriately and in a timely manner.
- 1.2. The Company acknowledges its duty to resolve all Complaints in a timely, clear, transparent and constructive manner, ensuring fair and effective Complaints handling process.
- 1.3. This Procedure applies with respect to Complaints received by any of the Company's Employees and any other person who interacts with the Company's Customers and provides services on the Company's behalf.

## 2. USED TERMS

- 2.1. Terms used in this Procedure shall have the same meaning as set forth in the Company's [Glossary], unless otherwise defined herein.

## 3. FILING OF COMPLAINTS

- 3.1. If a Customer believes that the Company provides its financial services improperly or breaches Customer's rights or legitimate interests, the Customer has a right to file a Complaint to the Company. If the Company is in any doubt about the eligibility of a Complainant, it should treat the Complainant as if they were eligible.
- 3.2. A Customer should file a Complaint to the Company no later than within 3 (three) months from the date on which a Customer became or should have become aware of the violation of their rights or legitimate interests.
- 3.3. A Complaint may be filed to the Company through any of the following channels:
  - 3.3.1. in writing by submitting a Complaint directly to the relevant Employee of the Company or by sending it to the Company's registered office address by regular or registered mail;
  - 3.3.2. in writing by submitting a Complaint to the Company via website [www.bebawa.com](http://www.bebawa.com);
  - 3.3.3. in writing by sending a Complaint to the Company's e-mail [info@bebawa.com](mailto:info@bebawa.com).
- 3.4. The Company shall in each case confirm to a Customer the receipt of a Complaint. A written confirmation shall be submitted to a Customer (including by way of electronic means if a Customer filed a Complaint by sending an e-mail) within 3 (three) business days upon receipt of a Complaint.
- 3.5. A Complaint should specify the following:
  - 3.5.1. Customer's name, surname;
  - 3.5.2. Customer's contact details;
  - 3.5.3. description of dispute matter;
  - 3.5.4. date of violation of Customer's rights;
  - 3.5.5. Customer's claim to the Company;
  - 3.5.6. any other information related to the Complaint.

- 3.6. When filling a Complaint, a Customer should submit any supporting documents they may have in relation to a Complaint.
- 3.7. A Complaint should be filed in Lithuanian or English language.
- 3.8. A Complaint can be submitted to the Company by a Customer's representative. In such case, representative's power of attorney or other document stating their right to act on behalf of the Customer should be submitted together with the Complaint.
- 3.9. Anonymous Complaints shall not be accepted and examined, unless the issue raised in a Complaint is important to the Company's activities or Company's good reputе or otherwise requires attention from the Company.
- 3.10. Filing of Complaints and Complaints handling process at the Company is free of charge.
- 3.11. With respect to Complaints' handling, all Employees of the Company must respect human rights and follow principles of fairness, reasonableness, objectivity and impartiality.

## **4. RECEIPT OF COMPLAINTS**

- 4.1. Any Employee who receives a Complaint addressed to the Company must register it as described below. Once registered, the person that received such Complaint should first direct it to the Head of Client Management Team. If the issue raised in a Complaint involves actions of the Head of Client Management Team, the person that received such Complaint must inform the Compliance Officer.
- 4.2. The received Complaints should be logged and kept electronically in [Complaints] (the Register), which can be found on [Bebawa documents>company folder].
- 4.3. The Complaints should be registered on their receipt date, and if they are received during the Company's non-working hours – no later than the next business day.
- 4.4. The following data is registered in the Register when a Complaint is received:
  - 4.4.1. registration number;
  - 4.4.2. the Complainant's name, surname;
  - 4.4.3. the Complainant's address specified in the Complaint or otherwise available to the Company;
  - 4.4.4. Complaint date and filing method;
  - 4.4.5. matter of the Complaint (brief content);
  - 4.4.6. the services or products complained about, their types.
- 4.5. The Complaint and all data related to it must be forwarded to the Head of Client Management Team (or the Compliance Officer if the issue raised in the Complaint involves the actions of the Head of Client Management Team) on their receipt date, and if they are received during the Company's non working hours – no later than the next business day.
- 4.6. If a Complaint does not contain enough information or there are any other shortages, the Company should reach out to a Complainant and set a reasonable date for elimination of such shortages, but not less than 7 (seven) calendar days. A Complaint will be considered as submitted properly only when a Complainant provides the Company with a revised Complaint or requested documents. If a Complainant eliminates shortages later than within the prescribed date, they have the right to submit a Complaint to the Company repeatedly.

## 5. COMPLAINTS' HANDLING

- 5.1. The Head of Client Management Team is responsible for the Complaints' handling. The Head of Client Management Team can assign their functions related to Complaints' handling to other Employees of the Company, but in such cases, the responsibility remains with the Head of Client Management Team.
- 5.2. The Compliance Officer shall be responsible for Complaints' handling as described in this Section if the issue raised in a Complaint involves the actions of the Head of Client Management Team.
- 5.3. Upon receipt of information about a Complaint, the Head of Client Management Team:
  - 5.3.1. assesses if a Complaint is in the scope of this Procedure (as indicated in Clause 5.8);
  - 5.3.2. confirms to a Complainant the receipt of a Complaint (if a Complaint is out-of-scope – explains why and, if possible, indicates who is responsible for handling a Complaint);
  - 5.3.3. assess the significance of a Complaint (as indicated in Clause 5.9);
  - 5.3.4. if needed, contacts any Employee of the Company for assistance or advice;
  - 5.3.5. if needed, informs the relevant Managers of the Company about a Complaint;
  - 5.3.6. collects and assesses all documents / information needed;
  - 5.3.7. analyses the historical data related to a Customer;
  - 5.3.8. if needed, communicates with a Complainant and asks for additional information;
  - 5.3.9. documents the investigation process;
  - 5.3.10. if required, receives an approval from the Managing Director of the Company (as indicated in Clause 5.10);
  - 5.3.11. provides a Reply to a Complainant as indicated in Clause 5.12 and in line with the terms indicated in Clause 5.11;
  - 5.3.12. makes the following entries in the Register:
    - 5.3.12.1. date and form of the Reply;
    - 5.3.12.2. the decision (final result of the Complaint examination).
  - 5.3.13. follows any other reasonable requirements related with Complaints' handling or outcomes of Complaints' handling process (if any).
- 5.4. The resolution of the Complaint might be one of the following:
  - 5.4.1. to accept the Complaint and, where appropriate, offer redress or remedial action; or
  - 5.4.2. to offer redress or remedial action without accepting the Complaint; or
  - 5.4.3. to reject the Complaint and give reasons for doing so.
- 5.5. In individual cases, when the decision does not satisfy Customer's expectations, it must explain why the Company has made such a decision, and additional alternatives to increase Customer's satisfaction may be offered.

- 5.6. If it is determined that a Complaint is justified (fulfilled or partially fulfilled), and financial services may have been provided by the Company improperly and/or in breach of legitimate Customer's expectations or interests, the situation in question must be recognised as a mistake and the Company must express its regrets and apologies to the Customer.
- 5.7. When justifying the resolution regarding the Complaint, the Company must ensure that its Reply is formulated as clearly and comprehensively as possible.
- 5.8. The Procedure shall not apply to:
  - 5.8.1. Complaints concerning the Company's activity which is not regulated by any financial regulatory laws and is not supervised by the Bank of Lithuania (i.e. is not related to the provision of financial services);
  - 5.8.2. Complaints concerning activity for the performance of which the Company is not responsible.
- 5.9. The Complaint is considered significant if it:
  - 5.9.1. contains a claim of over EUR 5,000 (five thousand Euros) (or equivalent);
  - 5.9.2. alleges fraud, gross negligence by the Company;
  - 5.9.3. poses a material reputational risk to the Company;
  - 5.9.4. alleges breach of information security or data protection laws.
- 5.10. If a Complaint is significant, the Reply to a Complainant should be approved by the Managing Director. This provision shall not apply if the functions and responsibilities of the Head of Client Management Team set out in this Procedure are performed by the Managing Director (as indicated in Clause 7.1). If a Complaint involves actions of the Managing Director – the Reply should be approved by the Board.
- 5.11. Complaints should be resolved within the following terms:
  - 5.11.1. not later than within 15 (fifteen) business days from their receipt;
  - 5.11.2. in exceptional cases, when due to reasons beyond the Company's control the Reply cannot be submitted to the Customer within 15 (fifteen) business days, the Company must send a preliminary Reply and must clearly indicate the reasons for delay in replying and the term by which the Complainant will receive a final Reply. In any case, the maximum term for the submission of a Reply cannot exceed 35 (thirty-five) business days from receipt of the Complaint.
- 5.12. The Head of Client Management Team will notify a Complainant in writing about the reached decision regarding their Complaint. The Reply should include:
  - 5.12.1. the resolution (as indicated in Clause 5.4);
  - 5.12.2. if the Complaint is not accepted, written motives of non-acceptance;
  - 5.12.3. references to documents which shall be attached to the Company's Reply;
  - 5.12.4. if the Complaint is not accepted, information about the right to reach out to the court;
  - 5.12.5. where the Complainant is a Consumer, information about the right to reach out to the Bank of Lithuania (as indicated in Clause 5.13.1);

- 5.12.6. information that if a Complainant has well-founded suspicions that the Company has breached certain provisions of legal acts regulating the financial market, a Complainant can submit a notification to the Bank of Lithuania, in Lithuanian or English language, by filling in the application form as specified on the website of the Bank of Lithuania ([link](#)) and sending it in writing or by electronic means at: Totorių St. 90, 01121 Vilnius, Lithuania or via e-mail [prieziura@lb.lt](mailto:prieziura@lb.lt).
- 5.13. Consumer Complaints
- 5.13.1. Where a Complaint is submitted by a Consumer, the Head of Client Management Team should also inform a Complainant that if they remain dissatisfied with the Company's response, they may refer the Complaint to the Bank of Lithuania.
- 5.13.2. The Company shall in such a case inform the Complainant that:
- 5.13.2.1. the competence of the Bank of Lithuania is to settle disputes between the Company on one side and the Customers who are Consumers on the other side;
- 5.13.2.2. a Complaint should be submitted within 1 (one) year of the initial application to the Company;
- 5.13.2.3. if a Complainant misses the 1 (one) year term to address a Complaint to the Bank of Lithuania, they will lose the right to apply to the Bank of Lithuania regarding the same dispute, i.e. any matter having the same parties and factual background, irrespective of the fact that a Complainant might have repeatedly addressed the Company;
- 5.13.2.4. the Complaint can be submitted in three ways:
- 5.13.2.4.1. through the electronic financial services dispute resolution system "Electronic Government Gateway";
- 5.13.2.4.2. by filling in the application form and sending it to the Legal and Licensing Department of the Bank of Lithuania, Totorių St. 4, 01121 Vilnius, Lithuania, or via e-mail [prieziura@lb.lt](mailto:prieziura@lb.lt);
- 5.13.2.4.3. by submitting a free-form application and sending it to the Legal and Licensing Department of the Bank of Lithuania, Totorių St. 4, 01121 Vilnius, Lithuania or via e-mail [prieziura@lb.lt](mailto:prieziura@lb.lt).
- 5.13.2.5. the Complaint must be in Lithuanian or English language;
- 5.13.2.6. examination of the Complaint by the Bank of Lithuania is free of charge;
- 5.13.2.7. further information can be found on the website of the Bank of Lithuania: <https://www.lb.lt/lt/daugiau-apie-gincus-su-finansiniu-paslaugu-teikeju>.
- 5.13.3. If the Complaint relates to the Company's services provided in another EU/EEA Member State than the Republic of Lithuania, Consumers may be able to submit their claims via FIN-NET network.

## 6. PUBLIC INFORMATION

- 6.1. The following information should be publicly available:
- 6.1.1. information that should be specified by a Customer in the Complaint (as indicated in Clause 3.5);
- 6.1.2. contact information of the Company, which should be used for submitting a Complaint by a Customer (as indicated in Clause 3.3);

- 6.1.3. time limit during which the Company must examine the Complaint (as indicated in Clause 5.11);
  - 6.1.4. information about Consumer's possibility to apply to a competent institution to examine the Complaint (as indicated in Clause 5.13.1).
- 6.2. The Company ensures that the information specified in Clause 6.1 shall be:
- 6.2.1. available on the Company's website, published in the form of Complaints Policy provided in Annex No 1 to this Procedure;
  - 6.2.2. included in the general terms and conditions of the Company;
  - 6.2.3. submitted to each Customer upon request.

## **7. THE HEAD OF CLIENT MANAGEMENT TEAM**

- 7.1. The Head of Client Management Team is responsible for proper implementation of this Procedure. If the Head of Client Management Team is not appointed within the Company, the functions and responsibilities of the Head of Client Management Team set out in this Procedure shall be performed by the Managing Director.
- 7.2. The responsibilities of the Head of Client Management Team shall be the following:
- 7.2.1. to handle Complaints (as indicated in Clause 5.3);
  - 7.2.2. in case of a conflict of interests, to revoke themselves from the decisions making;
  - 7.2.3. to provide relevant information with respect to Complaints' handling to the Compliance Officer which would be used for preparation of the Compliance Officer's reports to the Board (as indicated in Clause 8.2);
  - 7.2.4. to organise trainings for the Company's Employees on how to handle Complaints;
  - 7.2.5. to present the decisions of the Bank of Lithuania to the Managing Director with recommendations on how to pursue them;
  - 7.2.6. follow up the implementation of the court's decision and inform the Managing Director about it.

## **8. THE COMPLIANCE OFFICER AND THE BOARD**

- 8.1. The Compliance Officer shall be responsible for liaising with the Bank of Lithuania with respect to any matters related to Complaints' handling, including:
- 8.1.1. responding to the inquiries of the Bank of Lithuania with respect to Complaints' handling;
  - 8.1.2. representing the Company when disputes with Consumers are investigated by the Bank of Lithuania;
  - 8.1.3. preparing and submitting the annual report form EM008\_09 "Report on Received Complaints" to the Bank of Lithuania within 3 days after the date of adoption of the decision by the General Meeting of Shareholders on the approval of the set of annual financial statements of the Company (but in any case, no later than by 5th May).
- 8.2. The Company performs an ongoing evaluation of results of the Complaints' handling in order to identify deficiencies and potential legal and operational risks and to improve the quality of financial services provided by the Company and the Customer service culture. To enable the Company to perform such evaluations, the Compliance Officer:

- 8.2.1. collects information about the Complaints by services and products and analyses the information so that the main reasons for the Complaints can be determined and the priorities for the elimination of the reasons can be identified;
  - 8.2.2. assesses whether the main reason for certain Complaints can lead to the Complaints concerning other services or products;
  - 8.2.3. assesses whether the main reasons for certain Complaints can be eliminated and identifies elimination methods;
  - 8.2.4. proposes solutions to the Board for the elimination of the main reasons identified.
- 8.3. The Compliance Officer on at least semi-annual basis shall analyse information related to Complaints' handling and prepare a report for the Board. The report shall include the following information:
- 8.3.1. number of Complaints received;
  - 8.3.2. root causes of Complaints;
  - 8.3.3. services and products which Complaints relate to;
  - 8.3.4. information about similar Complaints related to a particular service or product including systemic issues (information about recurring or systemic reasons for the Complaints);
  - 8.3.5. other processes or products affected;
  - 8.3.6. priority for correction;
  - 8.3.7. proposals for actions to be taken by the Company to eliminate root causes of Complaints.
- 8.4. Having received and analysed the report, the Board shall initiate actions to eliminate established root causes of the Complaints.

## **9. RECORDS**

- 9.1. The Company must store information about the number of Complaints received and submit such information to the Bank of Lithuania upon request.
- 9.2. The Complaints of the Customers, information related to the investigation thereof, documents specifying the investigation results, and the Replies sent to the Customers shall be archived and stored by the Company for at least 3 (three) years since the day the final Reply was provided to the Customer.
- 9.3. Records of analysis and decisions taken by the Board in response to the information as well as information about the management decisions relating to the elimination of the operational deficiencies identified shall be stored by the Company for at least 3 (three) years.

## **10. FINAL PROVISIONS**

- 10.1. This Procedure shall be binding on all Employees, who shall be familiarized with this Procedure and/or amendments thereto by the Managing Director or an employee authorized by the latter.
- 10.2. This Procedure shall enter into force from the day of its approval and may be abolished, amended and/or supplemented only by a decision of the Board.
- 10.3. Amendments and/or supplements to this Procedure shall enter into force on the following day after the day of their adoption.

- 10.4. The Procedure must be reviewed at least annually by the Compliance Officer. Any modifications and amendments to the Procedure shall be made in writing and become effective once approved by the decision of the Board.
- 10.5. Breaches of the Procedure must be reported to the Compliance Officer without undue delay.
- 10.6. Annexes to this Procedure are an integral part of this Procedure.

## 11. ANNEXES

- 11.1. Annex No 1 – Complaints Policy of Bebawa UAB.

### *ANNEX NO 1 COMPLAINTS POLICY*

### *COMPLAINTS POLICY OF BEBAWA UAB*

If you are a customer or a potential customer of e-money and payment services provided by Bebawa UAB (“we” or “us”), this Complaints Policy applies to you.

#### 1. How to make a complaint?

If you are not satisfied with our services, you may contact our customer service and we will do our best to solve your issue as soon as possible.

You can also file a formal complaint to us, free of charge:

- by submitting it directly to our employees;
- by sending it to Bebawa’s registered office address at Mėsinių St. 5, Vilnius, Lithuania, by regular or registered mail;
- via our website [www.bebawa.com](http://www.bebawa.com); or
- by email at [info@bebawa.com](mailto:info@bebawa.com).

Your complaint should be filed not later than within 3 months of learning about potential violation of your rights or legitimate interests. Please file your complaint in English or Lithuanian language and specify:

- your name, surname;
- your contact details: residence address, e-mail and phone number;
- description of dispute matter;
- date of violation of your rights;
- your claim to us;
- any other information related to your complaint.

Please attach supporting documents to your complaint, if any, which could help us solve your issue more efficiently. If you file a complaint through your representative, representative’s power of attorney or other document stating their right to act on your behalf should be submitted together with the complaint. Please note that we generally do not accept anonymous complaints.

Unless you specify otherwise, by providing your email address in your complaint to us, you agree that we may provide information and further communication to you by this email.

#### 2. When will you get our reply?

Within 3 business days, we will send you confirmation that your complaint is received, together with the reference number of your complaint. We will keep you informed about the progress of handling your complaint. We will aim to provide you with our reply as soon as possible, but not later than within 15 business days from the date of receipt of your complaint.

In exceptional cases, when due to reasons beyond our control the reply cannot be submitted to you within 15 business days, we will send a preliminary reply to you indicating the reasons for delay in replying and the term by which you will receive our final reply. In any case, the maximum term for the submission of a reply will not exceed 35 business days from receipt of the complaint.

We will send you our reply to the email address specified in your complaint, in Lithuanian or English language. If you do not provide us with your email address or specifically request so, we will send you our reply to your residence address specified in your complaint.

### **3. What if our reply is not satisfactory?**

If you use our services for personal, family or household purposes, you will have the right as a consumer to refer your complaint to the Bank of Lithuania, free of charge. The competence of the Bank of Lithuania is to settle disputes between financial services providers on one side and consumers on the other side.

Your complaint should be submitted to the Bank of Lithuania in Lithuanian or English language within 1 year term of your initial application to us. If you miss the 1-year term to address the complaint to the Bank of Lithuania, you will lose the right to apply to the Bank of Lithuania about the same dispute, i.e. any matter having the same parties and factual background, irrespective of the fact that you might have repeatedly addressed us.

You can submit your complaint in three ways:

- through the electronic financial services dispute resolution system "Electronic Government Gateway";
- by filling in the application form and sending it to the Legal and Licensing Department of the Bank of Lithuania, Totorių St. 4, 01121 Vilnius, Lithuania, or via e-mail prieziura@lb.lt;
- by submitting a free-form application and sending it to the Legal and Licensing Department of the Bank of Lithuania, Totorių St. 4, 01121 Vilnius, Lithuania or via e-mail prieziura@lb.lt.

Further information can be found on the website of the Bank of Lithuania: <https://www.lb.lt/lt/daugiau-apie-gincus-su-finansiniu-paslaugu-teikeju>.

Consumers using our services in other EU/EEA Member States may also submit complaints via FIN NET network. Please note that even if you are not a consumer and the out-of-court dispute settlement procedure specified above does not apply to you, you have a right to reach out with your claim to the court or, if you believe to have well-founded suspicions that we have breached certain provisions of legal acts regulating the financial market, you can submit a notification to the Bank of Lithuania, in Lithuanian or English language, by filling in the application form as specified in the website of the Bank of Lithuania ([link](#)) and sending it in writing or by electronic means at: Totorių St. 4, 01121 Vilnius, Lithuania or via e-mail prieziura@lb.lt.