

Financial Services Complaint Resolution Procedure

For the Company Broker Consulting, a.s., Jiráskovo nám. 2, 326 00 Plzeň (Pilsen), Company ID: 252 21 736, registered in the Commercial Register at the Regional Court in Plzeň, Section B, File 1121 (hereinafter referred to as "the Company" only).

The present Complaint Resolution Procedure (the CR Procedure) regulates the formalities and conditions how to file and solve a Client's complaint with the k, as well as the complaint procedure in the field of financial services provided. The real estate business is governed by a separate Real estate CR Procedure.

1. The right to file a claim and a complaint, definition of the scope

A Company Client is anytime entitled to file a complaint or initiate a complaint procedure due to any deficiency in the conduct of any Company employee or co-operator, which, from the Client's point of view, has been contrary to legal regulations or Company Financial Services Code of Conduct (hereinafter referred to as the „CC associated with financial services“), or the Code of Conduct adopted by the Czech Association of Financial Counselling and Intermediation Companies, if this is the case of financial advisory and intermediation, eventually with legitimate expectation of a Client. A Client is also entitled to claim the quality of Company services, and improper performance in the field of financial services intermediation. All the Company Clients' complaints and claims are referred to as the complaints.

The Company has an interest in continuous improvement of its services provided to its Clients. Various suggestions of the Clients and deficiencies pointed out in the field of Company services or associates' conduct quality level are understood by the Company as valuable source of information for further improvement of Company activities. To that effect, the CC applicable to financial services was adopted. The CC wording is available at: www.bcas.cz.

2. Filing a complaint

A Client is entitled to file a complaint in several ways, i.e.:

- a) A letter of complaint sent to Company registered address stated in the letter head or to Broker Consulting, a.s., Office Park Nové Butovice, Bucharova 1423/6 (Building B), 158 00 Praha 5;
- b) By a phone call to toll free line No. 800 800 080;
- c) By a data mailbox to g2yc846;
- d) By e-mail addressed to stiznosti@bcas.cz, from such an e-mail address which **is** kept by the Company as a valid contact to a Client or by e-mail with a valid Client's electronic signature;
- e) By e-mail addressed to stiznosti@bcas.cz, from such an e-mail address which **is not** kept by the Company as a valid contact to a Client;
- f) Through a Company employee or co-operator.

In the event the complaint was filed in the manner stated in letter b), e) or f), then the Company may require, in particular, by reason of the need of clear Client's identification or his/her personal data protection, additional submission of the complaint under the letter a), c) or d) stated in this article, whereas the complaint shall be sent to the Company at the latest within 10 working days from the date following the date on which the complaint was originally filed. Time-limit to handle the complaint does not start before the date of filing the additional complaint, as stated in the previous sentence.

A Client may, under the provision of paragraph 2, letter f) hereof contact any employee or co-operator of the Company to submit a complaint. If a complaint was communicated by a Client to such employee by phone, then the employee is obliged to offer a Client a possibility to file his/her complaint individually – following paragraph 2, letter a), c), d), e) or during a call with a Client – however, this procedure requires to be given a Client's consent the complaint can be recorded based on the information submitted by a Client. A Client must be informed he/she could be subsequently required to provide the Company with additional information to his/her complaint, following the provision of paragraph 2, letter a), c) or d). If a complaint is submitted by a Client to a Company employee or co-operator personally. This person is then obliged without undue delay forward this complaint to respective BC unit. If

a complaint is submitted by a Client to a Company employee or co-operator personally, then this employee or co-operator is obliged to provide a Client with help to record his/her complaint, and subsequently, file this complaint on behalf of a Client, if he/she has asked to do so. However, in this event the complaint must be signed by a Client.

A complaint must include:

- a) Contact details (in particular: Client's name and surname, date of birth) and valid address to which a subject-matter complaint result shall be sent. In case of a legal person the following data are required: trade name, business name, ID-No., registered office address and a contact person. If a Client prefers the e-mail communication via e-mail address, this must be stated in the complaint as well, including relevant e-mail address;
- b) A description of the case that is the subject of a complaint, stating the data necessary to resolve it (i.e. contract number or other specification of financial product, eventually other subject of a complaint), and a description how Client's rights were affected;
- c) Name of Company co-operator who concluded a product contract, if a Client is aware of this information;
- d) Loss calculation or other compensation required by a Client, submission of the documentation proving the amount of loss incurred;

The case documentation shall be submitted in the form of annexes to a complaint. The Company hereby reserves its right to require from a Client additional information to a complaint filed to identify sufficiently the subject of a complaint and be able to resolve it successfully. In this case, the time-limit to resolve the complaint is interrupted, till the additional information are delivered by a Client to Company head office. If a Client does not send the information requested within 30 calendar days from the date on which the request to complete the complaint was received, the complaint is rejected due to its incompleteness.

Company co-operator is obliged to provide a Client with necessary cooperation in lodging the complaint. However, a Client is always lodging the complaint on his/her own and on his/her behalf, eventually under legal or contractual representation. The mandate granted to a representative shall be demonstrated by the power of attorney in writing, whereas the signatures affixed are not required to be verified officially. With the reference to one matter a Client is allowed to have only one attorney. If the procedure stated above and referring to the subject-matter of the complaint is not relevant and effective, the Company may determine another procedure.

3. Complaint acceptance and handling

Following the delivery of Client's complaint, the Company sends to a Client the confirmation of receipt, and a Client is familiarized with Company Complaint Resolution Procedure.

A time-limit for handling the complaint is **30 calendar days** from the receipt of the complaint by the Company.

The Company reserves the right to require from a client, without undue delay, to complete his/her complaint, which is aimed to resolve the complaint successfully. In this event, the time-limit for handling the complaint is interrupted or suspended till the complaint is completed by a Client and received by the Company.

The suspension of the time-limit is applicable when the completed information has not any material effect to the complaint resolution result, which means the time-limit for handling the complaint is stopped till the complaint is completed.

The interruption of the time-limit is applicable when the complaint cannot be resolved unless being completed (which is without doing this impossible or ineffective). In the event of the interruption, the new time-limit runs after the completion of specific complaint.

However, if a Client does not send to the Company information requested within 30 calendar days from the date on which the request to complete the complaint was received, the complaint is rejected due to its incompleteness.

4. Information to a Client of the result of his/her complaint resolution

Within the period of 30 calendar day from the receipt of the complaint a Client shall be informed of the result of his/her complaint resolution. If the day falls on weekend or a public holiday, then the lime-limit ends on the following working day.

The end of the time-limit means the day when the investigation results are forwarded to a Client. The decision on complaint, including the reasoning and investigation results, shall be sent to a Client by registered mail, a message delivered to his/her data box or by e-mail to the address recorded as Client's contact e-mail address.

In case of a registered mail, the relevant date referring to the compliance with a time-limit means the date stated on post office stamp, in case of e-mail and data box messages the relevant date means the date of message sending.

Where the complaint cannot be handled in the relevant time-limit, the Company is obliged at least to inform a Client of the reasons why his/her complaint could not be resolved in a timely manner, and inform about further procedure including the additional period to handle the complaint, if possible.

5. Lodging the appeal

If a Client is not satisfied with the complaint result, then, in accordance with the procedure defined in paragraph 2 hereof, he/she may lodge the appeal within **30 days** from the date on which a Client received the decision. If a Client states in his/her complaint new facts or claims, then it shall not be regarded as an appeal, but as the supplement to the original complaint, whereas the time-limit to resolve it starts to run again from the date when it was delivered to BC.

The date when the decision on complaint is considered delivered to a Client means:

- a) In case of the decision sent by registered mail to Client's address stated in written complaint, this is the date of receipt by a Client. If a Client has not taken over the letter, then it is considered received at the latest on the 15th day from the day when it was delivered to a Client without success, under the previous sentence,
- b) In case of the decision sent electronically to the e-mail address recorded by the Company as Client's contact e-mail, it is the date of the proof of receipt sent by a Client, however, at the latest the 10th calendar day after the sending,
- c) In case of a data box message, the moment when a person logs successfully in specific data box using the data box information system, i.e. a person authorized to access such data box and subject-matter document. In the event when a person authorized has not logged in the data box information system within the period of 10 days, the message is understood as delivered by the 10th day after being delivered to the data box of the addressee.

The Ethical Committee provides the Company Board of Directors or Supervisory Board with the recommendation to the Client's appeal. Subsequently, the matter shall be decided by the Company Board of Directors. The decision on resulting solution of the complaint has been sent to a Client similarly as stated above in paragraph 3, i.e. within 30 calendar days from the day on which an appeal was received by the Company.

6. Specific provisions

If a Client is still not satisfied with the handling of his/her complaint, then he/she is entitled to:

- a) Submit his/her proposal to the Out-of-Court Dispute Resolution Body – i.e. a Financial Arbitrator, tel. number: 257 042 094, Legerova 69, Praha 1, 110 00, www.finarbitr.cz, whereas this person solves primarily disputes in the field of life insurance, investments and consumer credits;
- b) File a complaint referring to the matters other than life insurance also to the Czech Trade Inspection (ČOI), tel. number: 296 366 360, Štěpánská15, Praha 2, 120 00, www.coi.cz;
- c) Bring an action before the competent court.

Also the following entities are entitled to resolve the complaints:

- a) The Ethical Committee of the Czech Association of Financial Counselling and Intermediary Companies (ČASF-ČR), tel. number: 221 628 07-8, Španělská 2, 120 00, Praha 2, www.casfpz.cz;
- b) The Czech National Bank (ČNB), tel. number: 224 411 111, Na Příkopě 28, Praha 1, 115 03, www.cnb.cz;

The Czech National Bank is the Supervisory Authority in financial products distribution.

A complaint cannot be solved if:

- a) a case described in a complaint does not concern the conduct of the Company, the products offered by the Company, and its representatives;
- b) the matter has been decided by the Court or the Financial Arbitrator.

7. Final provision

The CR Procedure is published on the Company website www.bcas.cz and on request is available in each OK POINT or Company office.

The present CR Procedure shall apply from 1 December 2020 and the CR Procedure of 1 December 2018 is replaced by it.