

COMPLAINT HANDLING POLICY

1. Purpose

The purpose of the Complaint Handling Policy (hereinafter referred to as the “**Policy**”) is to determine the main principles of accepting and handling complaints, providing answers and decisions to received complaints from clients, third parties or other persons in relation to business operations of:

- PAYSTRAX AB, a public limited company established and operating under the laws of the Republic of Lithuania, with registration number 304888494, having its registered office at Lvivo str. 25-701, Vilnius, Republic of Lithuania; and
- PAYSTRAX LTD, a private limited company established and operating under the laws of the United Kingdom, with registration number 11875619, having its registered office at Nile House, Nile Street, Brighton, United Kingdom, BN1 1HW,

(hereinafter referred collectively to as the “**Companies**” and individually as the “**Company**” for the purposes of this Policy where a provision applies without distinction).

2. Legal Background

2.1. PAYSTAX AB complies with all the reporting requirements set out in:

- 2.1.1. Law of the Republic of Lithuania on Payments, Article 90 (‘Duty to examine complaints of payment service users’); and
- 2.1.2. Rules for the handling of complaints received by financial market participants approved by the Board of the Bank of Lithuania Resolution No 03-105 on the 6 June 2013 (with all further updates).

2.2. PAYSTRAX LTD complies with all the reporting requirements set out in:

- 2.2.1. The Payment Services Regulation 2017;
- 2.2.2. Financial Services and Markets Act 2000, Section 226 (‘Compulsory jurisdiction’, under the Ombudsman Scheme); and
- 2.2.3. Claims Management Regulation – Complaints Handling Rules 2015.

3. Definitions

Applicant – a legal and/or natural person lodging a complaint concerning the services provided by the Company and/or the contracts concluded with the Company, i.e., a client of the Company, the potential client or his representative.

Complaint - the appeal submitted by the Applicant in writing to the Company, stating that the person’s rights or lawful interests related to the services provided by the Company or the contracts concluded with the Company have been infringed and requesting to satisfy the Applicant’s claims.

Customer - a natural or legal person, to whom the Company provides financial services.

Client - natural or legal person for whom the Company provides financial (acquiring) services.

4. Customer Complaint

- 4.1. A legal or natural person, who considers that their rights are/were abused, has the right to submit a Complaint to the Company. The Complaint should be addressed to the relevant Company depending on the jurisdiction where the business related to the Complaint occurred.
- 4.2. In order to ensure a smooth process of complaint handling and gathering of all relevant information, the Company accepts complaints in written form, in one of the following methods:
 - 4.2.1. By physical letter sent to the relevant Company's address:
 - PAYSTRAX AB: Lvivo str. 25-701, Vilnius 01402, Lithuania; or
 - PAYSTRAX LTD: Nile House, Nile Street, Brighton, United Kingdom, BN1 1HW.
 - 4.2.2. Via email to: complaint@paystrax.com
- 4.3. The Complaint should be written in Lithuanian or English language and it should include the following mandatory information:
 - Applicant's or their representative's name, surname, personal code/name of the company, registration code, in case the Applicant is a legal person;
 - Correspondence address/company's correspondence address, in case the Applicant is a legal person, and contact phone number;
 - Indicated date of the Complaint and place.
 - Indicated essence of the Complaint: violated rights and/or interests, in which way the Company violated the rights and/or interests, factual circumstances of the dispute, Applicant's request to the Company;
 - The format in which the Applicant would like to receive the answer from the Company;
 - Applicant's or their representative's signature or electronic signature on the Complaint;
 - Applicable annexes, if any, to the Complaint, regarding the essence of the Complaint, documents and supporting statements specified in the Complaint.

5. Complaint handling and decision-making process

- 5.1. When the Company receives a Complaint, the Applicant will receive a receipt notification with information of (i) the assigned responsible person handling the Company and (ii) estimated timeline of resolution.
- 5.2. Complaints are examined and answers to the Applicants are prepared by a responsible person appointed by the Company.
- 5.3. If a person appointed to examine the Complaint determines that additional explanations and/or other written evidence is necessary for further examination, he/she shall have the

right to request the Applicant to provide these explanations and/or evidence in writing by indicating the deadline for the submission of explanations and/or evidence.

- 5.4. The Applicant has the right to change the Complaint at any time before the decision on the Complaint is made by the Company.
- 5.5. The Applicant has the right to add new facts, evidence or to waive his/her claim. If the Applicant renounces its claim, the Company will terminate the initiated investigation of the Complaint.
- 5.6. Where the responsible person considers the Complaint resolved within 3 days of receipt, they must promptly send the Applicant a 'Summary Resolution Communication'. This summary should:
 - Refer to the fact that the Applicant has made a Complaint and inform the Applicant that the responsible person now considers the Complaint to have been solved.
 - For a complaint regarding PAYSTRAX LTD, inform the Applicant that if he/she subsequently decides that they are dissatisfied with the resolution of the Complaint, they have the right to refer the Complaint to the Financial Ombudsman Service (subject to the applicable time limits).
 - For a complaint regarding PAYSTRAX LTD, inform the Applicant whether or not the responsible person consents to waive the applicable time limits for the Financial Ombudsman Service to review the complaint by including the appropriate wording set out by the Financial Conduct Authority¹.
 - For a complaint regarding PAYSTRAX LTD, provide the website address of the Financial Ombudsman Service.
 - For a complaint regarding PAYSTRAX LTD, refer to the availability of further information on the website of the Financial Ombudsman Service.

6. Answers to the Applicant

- 6.1. The Company handles Complaints within the following deadlines:
 - 6.1.1. Subject to paragraph 6.1.2, a response must be provided to the Applicant within an adequate timeframe and at the latest within 15 (fifteen) business days after the day on which the Company received the Complaint.
 - 6.1.2. In exceptional situations, if a response cannot be given in accordance with paragraph 6.1.1 for reasons beyond the control of the Company, the Company must inform the Applicant, clearly indicating the reasons for the delay and specifying the deadline by which the final response will be provided.
 - 6.1.3. The deadline for the final response specified under paragraph 6.1.2 must not be later than 35 (thirty-five) business days after the day on which the Company received the Complaint.

¹ <https://www.handbook.fca.org.uk/handbook/DISP/1/Annex3.html>

- 6.2. The Company shall make every effort to address all points raised in the response to the Complaint.

7. Final provisions – right to referral

- 7.1. The Applicant has the following means of referral in the Republic of Lithuania, for a complaint regarding PAYSTRAX AB:
- 7.1.1. If the response and/or resolution from the Company does not satisfy an Applicant which is a legal person, it can address the issue to the court of Lithuania.
 - 7.1.2. If the response and/or resolution from the Company does not satisfy an Applicant which is a natural person, he/she may address the Complaint according to the requirements of applicable legal acts in Lithuania. The Complaint may be addressed to the Bank of Lithuania by written physical letter (address: Žalgirio str. 90, 09303 Vilnius) or via email (frpt@lb.lt).
- 7.2. The Applicant has the following means of referral in the United Kingdom, for a complaint regarding PAYSTRAX LTD:
- 7.2.1. If the Complaint is not resolved or the Company has not provided a response in accordance with the provisions of section 6 of this Policy, the Applicant can contact the Financial Ombudsman Service within 6 months of the Company's final response to review the Complaint.
 - 7.2.2. Legal persons may be eligible for the services provided by the Financial Ombudsman Service if they have an annual turnover of less than £6.5 million and fewer than fifty employees.
 - 7.2.3. Contact information for the Financial Ombudsman Service:
 - Address: Financial Ombudsman Service, Exchange Tower, London E14 9SR.
 - Call: 0800 023 4 567 or, from outside the UK +44 20 7964 0500
 - Email: complaint.info@financial-ombudsman.org.uk
 - Visit www.financial-ombudsman.org.uk for more information.
 - 7.2.4. If the response and/or resolution from the Company does not satisfy an Applicant which is a legal person, it can address the issue to the Financial Conduct Authority or the applicable court of the UK.
- 7.3. All information related to Applicants' Complaints is stored by the Company for 3 (three) years.