

Complaint Policy

Article I.

Introductory Provisions

1. This Complaint Policy regulates the rights and obligations of the company Wealth Effect Management o.c.p., a.s., seated at Bottova 2A, 811 09 Bratislava, Company reg. no.: 51 127 113, registered at: the Business Register of the City Court Bratislava III, Section: Sa, File No.: 6652/B (hereinafter referred to as the **“Company”**) as a securities broker, and the client based on and in connection with filing a claim and/or complaints of the clients regarding the investment services or additional services provided by the Company, the employees or persons at the Company, or the facts related to the investment services, additional services provided by the Company and/or processes of their provision by the Company.
2. Authorized person shall mean the person authorized to file a claim or complaint under this Complaint Policy. The authorized persons are, in particular, but not exclusively, clients or potential clients of the Company or third persons proving their legal interest in the claim or complaint filed.
3. Claim shall mean the right, exercised by the authorized person, to the responsibility for defects of the services provided by the Company, which is under this Complaint Policy and pursuant to Act No. 566/2001 Coll. on securities and investment services and on the amendment and supplementation of certain acts (the Securities Act) exercised against the Company as the securities broker.
4. Complaint shall mean an objection or reservation brought by the authorized person in relation to the services provided by the Company or the processes of the Company if such objection cannot be considered a claim and is filed by the authorized person against the Company pursuant to this Complaint Policy and Act No. 566/2001 Coll. on securities and investment services and on the amendment and supplementation of certain acts (the Securities Act) (hereinafter referred to as the **“ZoCP”**).
5. For the purposes of this Complaint Policy, the terms “claim” and “complaint” shall have equal and equivalent meaning irrespective of which one is used, unless the logical interpretation of the respective provision herein indicates otherwise.
6. Complaint proceedings shall mean a proceeding held by the Company based on the claim/complaint filed by the authorized person to assess the quality and/or correctness of the services provided by the Company.
7. The complaint shall not be, in particular, but not exclusively, the following:
 - a) filing of the client or a third person to improve or change the services provided by the Company;
 - b) request of the client or a third person which - based on its contents - cannot be considered a claim or a complaint;
 - c) request of the client or a third person to investigate the services provided and/or the processes of the Company which were provided based on false or incorrect instructions or information from the client;
 - d) filing of the person not authorized to file a claim or a complaint.

Article II.

Receipt of Complaints

1. An authorized person may file their complaint:
 - a) in writing using mail or a courier service;
 - b) in person at the registered office of the Company at Bottova 2A, 811 09 Bratislava, or at any of its branches (if any such exist);
 - c) by email to the email address of the Company: backoffice@wem.sk.
2. In case the client is a natural person, the written complaint must include the name and surname of the (potential) client, date of birth and valid address to receive the result of the complaint investigation. In case the client is a legal entity, the complaint must include the business name of the company, the address of its

registered office, the company registration number and data of the contact person authorized to act on behalf of the client (legal entity) in this matter. In the complaint, the (potential) client must specify the service or processes subject to the complaint, describe the reasons of the complaint and present documents substantiating and proving the relevance of the complaint, and shall indicate other facts relevant for the assessment of the complaint. The complaint must clearly indicate what does the authorized person claim. In case of incomplete information and documents necessary for correct assessment of the complaint and its successful resolution, it is possible to ask the (potential) client to supplement them. The Company is obliged to process the complaint also in case it is incomplete and the client failed to correct or supplement it, despite being provided with an additional time period to do so. In such case, the Company considers only the data provided in the incomplete complaint of the client. In case the complaint is unclear and the client filing it fails to correct or supplement it in the additionally allotted time period, the Company is not obliged to process such unclear complaint. The written complaint of the (potential) client must be signed and dated to be processed by the Company.

3. Complaints filed in person at the registered office of the Company will be written down by an employee of the Company with the (potential) client in form of written protocol on complaint which must contain data under Section (2) of this Article herein. The protocol shall be dated and signed by the (potential) client filing the complaint and the employee of the Company who has written the protocol down. The protocol shall be drawn up in two copies, one of them staying with the Company in order for it to be investigated and one of them to be kept by the (potential) client filing the complaint.
4. In case the complaint is filed electronically to the email address of the Company under Article II. Section (1) herein, it must contain the data under Section (2) herein and must be, within five days from its delivery to the Company by the client, supplemented in writing or in person at the registered office of the Company pursuant to Sections (2) or (3) of this Article herein, otherwise it is invalid and the Company is not obliged to assess and process such a complaint.
5. Every complaint received by the Company must be recorded.

Article III.

Investigating and Processing of Complaints

1. The Company shall investigate and process the complaints in line with its internal procedures and this Complaint Policy.
2. The complaint may not be investigated and processed by the employee of the Company or a person against whom the complaint is directed or employees of the Company or persons who provided services for the authorized person on behalf of the Company and whose services or actions are subject to the complaint.
3. The Company shall investigate simple complaints within five business days from their receipt. Complaints must be received with all the details under Article II. Section (2) herein. Simple complaint means that (i) the procedure of its investigation is clear; (ii) the person or service subject thereto is known; (iii) it can be assessed without any further or deeper investigation; (iv) the statement of the Company to the subject of the complaint is known; (v) the decision on the complaint can be made based on the information and documents available to the person processing the complaint; and (vi) it is not necessary to ask for the statement of the person concerned or other authorized person of the Company.
4. Based on the knowledge and information from available sources and the information system of the Company and the nature of the complaint, the Company shall assess the justification of the complaint. In case it is justified, it shall propose a rectification measure.
5. If the complaint is complex and based on its contents or the violations it describes it cannot be considered a simple complaint under Section (3) herein, the Company shall assess it within thirty business days from the date of its receipt. Complaints must be received with all the details under Article II. Section (2) herein.
6. Complex complaint means that (i) the procedure of its investigation is unknown and the contents thereof deviate from common standards or procedures; (ii) the person or service subject thereto is unknown; (iii) its assessment requires deep, thorough and specialised investigation; (iv) the statement of the Company to the subject of the complaint is unknown; (v) the decision on the complaint cannot be made based on the information and documents available to the person processing the complaint; and (vi) it is necessary to ask

for the statement of the person concerned or other person, in particular, the Board of Directors or the Supervisory Board of the Company.

7. Simple complaints must be processed within 5 business days from the receipt of the complaints containing all the required details. In justified cases, this period may be prolonged to 30 business days. If it is not possible to process the complaint even in the prolonged period of 30 business days, the Company shall inform the authorized person filing the complaint in writing and state the reasons why it cannot be processed in the prolonged period and further procedures in the subject matter.
8. Complex complaints must be processed within 30 business days from the receipt of the complaints containing all the required details. In justified cases, this period may be prolonged by 30 business days. If it is not possible to process the complaint even in the prolonged period of 30 business days, the Company shall inform the authorized person filing the complaint in writing and state the reasons why it cannot be processed in the prolonged period and further procedures in the subject matter.
9. The Company shall inform the authorized person filing the complaint on the result of the complaint processing. The written notification of the processing result shall be sent to the address stated by the authorized person in the complaint. The complainant must be informed in writing also if the complaint is assessed as unjustified, stating the reasons why it was denied.
10. The decision of the Company to assess the complaint as unjustified shall contain:
 - a) the date of filing the complaint and brief description of the subject of the complaint;
 - b) the name of the person filing the complaint and what does he or she claim;
 - c) the result of the complaint investigation and assessment being unjustified;
 - d) brief statement of the reasons why the complaint was assessed or evaluated as unjustified;
 - e) the date of completion of the complaint processing;
 - f) the statement whether the complaint was processed in the ordinary period or prolonged period;
 - g) the date of issue of the complaint assessment;
 - h) the signature of the employee of the Company.
11. In case of complaint processing not covered by Section (10) of this Article herein, the written decision of the Company on processing the complaint shall, in addition to the details under Section (10) points (a), (b), (e), (f), (g), and (h) herein, include also:
 - a) the result of the complaint investigation and assessment being justified;
 - b) brief statement of the reasons why the complaint was assessed or evaluated as justified;
 - c) adopted rectification measures and the deadline for their implementation.

Article IV.

Appeal against the Decision of the Company

1. The authorized person may file an appeal against the complaint processing decision within 15 business days from its receipt. The appeal shall be sent to the address of the Company.
2. The appeal must clearly state:
 - a) that it is an appeal against the decision of the Company on complaint processing;
 - b) what the authorized person claims;
 - c) the flaws of the decision of the Company as regards its decision on complaint processing the authorized person identified and why he or she is filing the appeal;
 - d) who filed the appeal, i.e., the identification data under Article II. Section (2) herein;
 - e) when it was drawn up; and
 - f) it must be signed by the authorized person.
3. The Company shall not take into account appeals which do not contain the data under Section (2) herein and shall not process them.
4. The appeals shall be decided by the Board of Directors of the Company.
5. The decision of the Board of Directors of the Company on the appeal shall be subject to adequate provisions of this Complaint Policy on complex complaints and other relevant provisions.

Article V.

Costs Related to Complaint Processing

1. The costs related to the complaint incurred by the authorized person shall be borne by the authorized person, unless this Complaint Policy or a written agreement with the Company stipulate otherwise.
2. The costs related to complaint incurred by the Company shall be borne by the Company, unless this Complaint Policy or a written agreement with the authorized person stipulate otherwise.

Article VI.

Delivery of the Documents

1. Any and all documents related to the legal relationships under this Complaint Policy of the Company and the authorized person shall be delivered:
 - a) by mail;
 - b) by third persons authorized to deliver mail;
 - c) in person; or
 - d) electronically to the email addresses stated in this Complaint Policy or in an agreement concluded by the Company and the authorized person.
2. Documents related to the legal relationships under this Complaint Policy between the Company and the authorized person shall be delivered via registered mail to the address of the authorized person or the Company stated in this Complaint Policy. The parties are obliged to inform each other on any changes to their residence or registered office under the principles in this article within 15 days after such change occurs.
3. Should the party fail to accept the mail at the address stated in this Complaint Policy or in the written complaint, it shall be considered delivered on the third day after its return to the sender, even if the recipient is unaware thereof. All the legal consequences of the document delivery shall commence on the day the document is considered delivered.
4. Should the party fail to accept the mail at the address stated in this Complaint Policy or in the written complaint, the sender shall be obliged to send the mail to the address of the party as registered with the business register or other register again. For such a delivery, the provisions of Section (3) herein shall apply in full.

Article VII.

Final Provisions

1. The Company has the right to unilaterally amend or supplement this Complaint Policy at any time in order to implement updates as well as changes to the legal regulations.
2. The Company shall publish the amended Complaint Policy at its registered office and on the website of www.wem.sk prior to the change coming to force.
3. Amendments to the Complaint Policy and the amended Complaint Policy itself shall come to force on the 15th day after its publication on the website of the Company (www.wem.sk).
4. The client may express their objections to the change of the Complaint Policy by written notification delivered to the Company within 15 days after the publication of the amendments or supplementation to the Complaint Policy. In case the client objects to the amendment or supplementation of the Complaint Policy within 15 days after the publication of the amended or supplemented Complaint Policy and the Company does not agree with them on the matter of the amendments, the client and the Company may both terminate their contractual relationship. In case the client takes any legal action during the above period against the Company in order to receive the services provided by the Company, they are considered to have agreed with the amended or supplemented Complaint Policy.

5. In case the client does not express their objections to the amendments or supplementation to the Complaint Policy within the period under Article VII. Section 4 herein, it is assumed that they agree with the amended or supplemented Complaint Policy.
6. The Company and the client hereby agree that the legal relationships not regulated herein shall be governed by the respective provisions of the individual contracts concluded by and between the Company and the client, the general business terms and conditions of the Company, the ZoCP, and other generally binding legal regulations, with the exclusion of collision norms.

This Complaint Policy becomes valid and effective as of 10 October 2017.