

CLIENT COMPLAINT HANDLING RULES

1. These rules regulate the procedure for receiving and reviewing Client claims (complaints) submitted to Benker UAB, ensuring a high level of service and prompt resolution of arising issues.
2. These rules apply to all complaints related to the services provided and cover quality control procedures and dispute resolution.
3. Complaints regarding disputed transactions made by the Client are subject to acceptance, registration, and review in accordance with established regulations.
4. Familiarization with and adherence to these rules are mandatory for customer support staff and other responsible employees of the Company involved in the processing and resolution of complaints.

Terms and Definitions Used in the Rules

- 5.1. Response – a written explanation provided to the Client in reply to their inquiry or stated demands.
- 5.2. Company – Benker UAB (registration code: 305084126, registered address: Konstitucijos pr. 18B, 15th floor, Vilnius, LT-09308, Republic of Lithuania).
- 5.3. Electronic Dispute Resolution System – a specialized online platform designed to assist users in resolving disputes arising from contracts concluded remotely.
- 5.4. Client – an individual or legal entity registered in the Company's system and possessing an active account.
- 5.5. Claim (Complaint) – an official written request submitted by the Client to the Company, reporting a violation of their rights or legitimate interests related to the services provided by the Company or concluded agreements, and requesting their restoration.
- 5.6. Claims (Complaints) Registration Log – a digital register that records all claims (complaints) received from Clients via email or other online channels. It is maintained in electronic format and is accessible to Company employees within the internal system.
- 5.7. Inquiry – a verbal or written request from the Client regarding the services provided or customer support, where the issue does not require complex actions and can be resolved immediately or during direct communication with the Client.
- 5.8. User – an individual who utilizes the Company's services solely for personal purposes, not related to business, trade, or professional activities.

Registration of Client Inquiries and Complaints

6. A Client may submit an inquiry in writing by sending it to the email: help@benker.io.

7. All incoming Client inquiries are processed in accordance with established registration and service procedures.

8. Verbal inquiries made via phone or in person at the Customer Service Department are addressed immediately, and the necessary information is provided to the Client during the conversation. If an immediate response is not possible, the employee must request the Client to submit the inquiry in writing.

9. Upon receiving a written inquiry, a Customer Service Department employee, either independently or with the assistance of specialists from other departments, ensures that the Client receives a comprehensive and detailed response.

10. If the content of the written inquiry meets the criteria of a complaint, the employee handling the Client's request marks it in the system as a complaint and forwards it to the responsible specialist assigned under Clause 20 of these Rules no later than the next business day. The designated employee registers the complaint in the electronic Complaint Registration Log and initiates its review process.

Procedure for Submitting Client Complaints

11. If a Client believes that their rights or legitimate interests have been violated due to improper actions or inactions of the Company or its employees, they have the right to submit a complaint using one of the following methods:

11.1. In person at the Company's Customer Service Department at Pilaitės pr. 16, Vilnius, by filling out a complaint form and handing it to a customer service representative.

11.2. By mail to the Company's registered address: Konstitucijos pr. 18B, 15th floor, Vilnius, LT-09308, Republic of Lithuania.

11.3. By email to help@benker.io. Important: To verify the Client's identity, complaints are accepted only if sent from the personal email address registered in the Client's account.

11.4. Through the Company's website <https://benker.io> by filling out the inquiry form in the "Contacts" section.

11.5. Via the Online Dispute Resolution System on the <https://webgate.ec.europa.eu/odr> platform.

Procedure for Submitting and Processing Complaints

12. A complaint may be submitted either by the Client personally or by an authorized representative (e.g., a lawyer acting on behalf of the Client). In such cases, the representative must provide documents confirming their authority (e.g., a power of attorney, representation agreement, etc.). A copy of the document authorizing the representative to act on behalf of the Client must be certified by the responsible Company employee. The certification must include the note "True Copy", the date, the name, surname, and position of the certifying employee, as well as their signature. This copy is then attached to the complaint. If the necessary documents are not provided, the responsible employee must request them from the representative.

13. A complaint must include the following information:

13.1. Full name (for an individual) or company name (for a legal entity);

13.2. Client's address;

13.3. Contact details – phone number or email address;

13.4. Date of submission of the complaint;

13.5. Description of the issue – details on which rights or legal interests of the Client have been violated;

13.6. Client's demands to the Company;

13.7. Supporting documents, if available, related to the complaint.

14. If any of the required details listed in section 13 are missing, the Company has the right to request the Client to clarify or supplement the complaint.

15. A written complaint must be legible and clearly formulated and signed by the Client or their authorized representative.

16. Verbal complaints are addressed immediately during the conversation, and the Client is provided with the necessary information. Important: The Company provides a written response only to complaints submitted in writing.

17. All complaints submitted in person at the office: (Konstitucijos pr. 18B, 15th floor, Vilnius, LT-09308, Republic of Lithuania) or sent by mail to the same address must be scanned and forwarded via email to the responsible employee no later than the next business day after receipt. The designated employee registers the complaint in the Complaint Registration Log and initiates its review.

Registration and Handling of Client Complaints

18. Complaints received via email at help@benker.io must be assigned to the designated responsible employee, as specified in these Rules, no later than the next business day after receipt. The responsible employee registers the complaint in the Complaint Registration Log.

19. Complaints submitted to the Customer Service Department, as well as the responses to them, must be organized and stored in a separate folder titled "Client Complaints".

Review of Complaints

20. Complaints are reviewed and responses are prepared by the designated employee, responsible for handling complaints and preparing appropriate responses within the Customer Service Department.

21. If the complaint is complex or substantial in nature, it will be discussed with the head of the Legal Department, and the review and response will be handled jointly by the Legal

Department staff and the employee responsible for handling complaints, as specified in section 20.

22. If the complaint involves the actions of a Company employee, the employee in question and their immediate supervisor must be informed of the decision made.

23. If a query or complaint is submitted via email to help@benker.io :

23.1. The response to a complaint received via email will be sent to the Client from the same address, help@benker.io. The response is prepared by the employee assigned under section 20, responsible for handling complaints and preparing responses.

23.2. All queries received at help@benker.io are processed by the Customer Service Department, with responses provided either by the department staff or with assistance from other Company employees.

24. The response sent from help@benker.io must be approved by the head of the Customer Service Department or their direct deputy.

25. A complaint is considered resolved when all actions to address the issue have been completed, a decision has been made, and a response has been provided to the Client.

26. Complaint Review:

Upon reviewing a complaint, the Company makes a decision to acknowledge the Client's complaint as:

- 26.1. Satisfiable – The Company acknowledges that the Client's demands are lawful and justified, and takes measures to satisfy them.
- 26.2. Partially satisfiable – The Company partially satisfies the Client's demands.
- 26.3. Unsatisfiable – The Client's demands are unfounded and therefore cannot be satisfied.

27. If the Client's complaint was filed through the Electronic Dispute Resolution System:

- 27.1. A Customer Service Department employee, within 30 days of receiving the complaint in the Electronic Dispute Resolution System, connects to the Electronic Dispute Resolution System and, if an agreement with the Client is not possible, proposes a dispute resolution institution – the Bank of Lithuania.
- 27.2. If the Client agrees that the complaint will be considered by the Bank of Lithuania, the Electronic Dispute Resolution System automatically forwards the complaint to the Bank of Lithuania.
- 27.3. The dispute resolution institution makes a decision within 90 days.
- 27.4. If the Client and the Company cannot agree on the choice of a dispute resolution institution within 30 days, the complaint is considered inactive.

28. If the Company decides to refuse to satisfy the Client's complaint or to partially satisfy it, the Company's written response to the Client must meet the following requirements:

- 28.1. The Company's decision to refuse to satisfy the complaint (partially satisfy the complaint) must be reasoned, supported by documents (these documents (copies thereof) must be attached to the Company's response), provisions of the General Payment Services Agreement or legislative norms; if the Client's complaint challenges a payment transaction that could have been carried out by fraudsters and/or as a result of fraudulent activities, the Company, when considering the complaint, strives to clarify all the circumstances of the disputed payment transaction that can help the Company properly and thoroughly assess both the authentication procedure of the disputed payment transaction and the Client's intention to carry out the corresponding payment transaction.
- 28.2. The Company's written response must contain information on measures to protect the Client's interests, including, but not limited to, possible dispute resolution methods and rights; when the Client is a User, the written response indicates that the Company's decision to refuse to satisfy the Client's complaint or partially satisfy the complaint can be appealed to the Bank of Lithuania within one year from the date of filing the Client's complaint with the Company, in accordance with the procedure established by the rules of procedure for out-of-court dispute resolution at the Bank of Lithuania between consumers and financial market participants, approved by the decision of the Board of the Bank of Lithuania No. 03-23 "On approval of the Rules of Procedure for out-of-court dispute resolution at the Bank of Lithuania between consumers and financial market participants" dated January 26, 2012.

29. If it is established that the Client's complaint is justified (decided to satisfy it fully or partially), and the financial service could have been provided improperly, which violated the Client's legitimate expectations and/or interests, the Company's response to the Client must express regret for the improper provision of the financial service and offer an apology.

30. The Company's response regarding the decision to refuse to satisfy the Client's complaint or to partially satisfy it must clearly and understandably explain to the Client why the Company made such a decision. The response may also propose additional measures aimed at increasing the Client's satisfaction with the Company's services.

Letters from Competent Authorities Regarding Dispute Resolution with Clients

31. Letters from competent authorities regarding dispute resolution with Clients are registered in the received documents register in the internal electronic document management system in accordance with the established procedure for registering received documents. Letters from competent authorities are registered by the Company's administrator.

32. After registering a letter from a competent authority regarding a dispute with a Client, the Company's administrator forwards the letter or sends it by email to the Head of the Customer Service Department or the Head of the relevant division of that department, who immediately forwards the letter or sends it by email to the employee responsible for reviewing Client complaints and preparing responses to them, appointed in accordance with paragraph 20 of the Rules.

33. Interaction with the Bank of Lithuania on Client Complaints:

In the event that the Bank of Lithuania forwards a client's complaint to the Company or requests clarifications regarding a dispute under consideration:

- 33.1. The specialist responsible for handling complaints, in accordance with paragraph 20 of the regulations, is required to create a separate case in the "Jira" task management system, where all information about the progress of the case and the deadlines for providing responses to the client and the Bank of Lithuania is recorded.
- 33.2. The prepared response to the client and/or the Bank of Lithuania is subject to mandatory approval by the Legal Department.

Timeframes for Processing Client Complaints:

34. Upon receiving a complaint challenging the correctness of a payment transaction confirmation, the Company shall immediately, no later than the end of the next business day, commence its review.
35. After receiving a complaint, the Company shall, within one business day, notify the client of its registration in the corresponding log.
36. For clients who are users, the deadline for providing a response to a complaint must not exceed 15 business days from the date of receipt. In the event of circumstances beyond the Company's control that prevent compliance with this deadline, the client shall be sent an interim response indicating the reasons for the delay and the estimated date of providing the final response. The total processing time for the complaint must not exceed 35 business days from the date of its receipt.
37. For clients who are not users, a response to a complaint must be provided within 30 calendar days from the moment of its registration.
38. After providing a response to the client, the responsible employee (head of the customer service department, its division, or appointed in accordance with paragraph 20) enters the date of the response and a brief summary of the decision into the complaint registration log.
39. Responses to inquiries from competent authorities regarding disputes with clients are provided within 30 calendar days, unless otherwise specified in the inquiry itself.

Archiving Complaints and Responses:

40. Client complaints and responses to them are stored in the electronic document management system. Information about the complaint with a link to the system is also reflected in the client's personal account.
41. Complaints from competent authorities and responses to them are registered in accordance with the established procedure and stored in the internal document management system.

Final Provisions:

42. Upon satisfaction of a complaint or receipt of comments from competent authorities regarding non-compliance of services, the company takes measures to eliminate deficiencies and prevent their recurrence.
43. These rules are approved and amended by order of the company's general director.

44. Regular review of the rules (at least once every two years, or more often as needed) ensures their relevance in accordance with legislation and changes in the company's activities.

45. The head of the customer service department is responsible for submitting proposals for changes to the rules to the general director or legal department.