



COMPLAINTS HANDLING PROCEDURE

Table of Contents

1.	Definition	4
2.	Introduction	4
3.	Filing Complaint	4
4.	Receiving Complaints	4
5.	Handling Complaints	5
6.	The Complaint form	5
7.	Review	5
8.	Solving Complaints	5

1. Definition

Complaint – an expression of dissatisfaction (oral or written) about the provision of, or failure to provide, a financial service.

2. Introduction

The complaint management procedures for the handling of complaints received by Sonect Europe and Sonect AG (here in after referred to “Sonect”) are established with the aim to implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints or grievances received from current or potential customers and keep a record of each complaint or grievances and the measures taken for the complaint’s resolution. The Procedure Manual for handling client’s complaints gathers all measures taken by Sonect in order to solve potential inconveniences that might occur.

3. Filling Complaint

The customers willing to submit a complaint are advised to complete a Complaint Form and to send it to Sonect through the following means:

- By sending an e-mail with a brief explication of the subject of complaint at support@sonect.ch
- By sending the compliant via registered mail/mail at Vokiečių str. 28-16, LT-01130, Vilnius, Lithuania to Sonect Europe
- By sending the compliant via registered mail/mail at Dufourstrasse str. 47, 8008 Zürich, Switzerland to Sonect AG
- By completing a Complaint form on a website of Sonect www.sonect.ch
- By completing a Complaint form on Sonect wallet application.

The complaint form can be sent electronically to the unit-holder concerned upon the receipt of an inquiry or can be downloaded from the Sonect website www.sonect.ch

4. Receiving Complaints

After receiving the complaint, the Compliance Department notifies by the end of the next working day the complainant that his inquiry was received.

Any complaint form received by Sonect will be assigned a protocol number and registered in Complaints’ Register maintained by the Compliance Department. The compliant will be

examined and resolved by the Compliance Department in cooperation with the Head of the Department involved with the complaint.

5. Handling Complaints

The Compliance Department is responsible for handling customer's complaints or grievances. Their duties include the effective and efficient handling of customer's complaints or grievances to enable Sonect to adopt and apply the required actions to fully protect the customers' and Sonect interests, acting independently and objectively and ensuring that corrective measures are introduced to prevent the repetition of the same complaints or grievances. In the cases where the complaint or grievance involves the Compliance Department it is to be handled by the MLRO.

In the Compliance Officer absence, the head of Compliance department should appoint the responsible person for the implementation of the Company's Complaints Handling Procedures.

6. The Complaint form

The Complaint form is available on the Sonect website (www.sonect.ch). The Compliance Department records the complaint in the customer's complaint form which includes the following information:

- details of the client that made the complaint,
- the service/department to which the complaint refers to,
- the details of the employee responsible for the service/s rendered to the client,
- the organizational unit where the relevant employee belongs,
- the date of receipt and of registration of the complaint,
- the content of the complaint, in brief,
- the magnitude of the damage which the client claims to have suffered or which can be presumed to have suffered on,
- the basis of the contents of the complaint,
- the date and, briefly the content of Sonect written response to the complaint lodged,
- a reference to any correspondence exchanged between Sonect and the client.

7. Review

The Compliance Analyst shall carefully review the details of each customer's complaint. Once the Compliance Analyst understands fully the nature of the customer complaint, he/she shall investigate and question the relevant Heads of the Departments related to each Client complaint and will:

- Solve the Complaint by replying to the complainant and informing the Director regarding the decision or
- Seek assistance by the Head of Department.

8. Solving Complaints

The Head of the relevant department shall take all necessary measures:

- investigate and question the relevant personnel of the Departments related to each complaint (if necessary),
- communicate with other Head of Departments/employees if this is required for solving the Complaint,
- reach out to the customer via email, to identify the nature of the complaint, if necessary, the Compliance Analyst will investigate the relevant Heads of Departments related to each customer complaint. Once the Compliance Analyst and the Director thoroughly analyse the matter, the decision will be communicated to the complainant and / or the person in charge of the client complaint. Where applicable the Board of Directors as well as the legal advisor of the Applicant shall also be informed.

9. Time Frame

According to the Sonect policy, the complaints will be solved in maximum 15 working days. In case, due to the nature of the complaint, more time is required for the complaint to be fully investigated and solved, the Head of the relevant Department should inform the Compliance Analyst. The Compliance Department shall notify the complainant about the investigation running and to inform him /her about the approximate time period until the final response is sent, is laid down, which cannot be longer than 35 days starting from the working day following the reception of the initial complaint or the reception of additional evidence provided by the unitholder concerned.

The Compliance Analyst should fully investigate the complaint/grievance in coordination with the Head of the involved department and if deem necessary with the Director and/or the legal advisor.

10. Records and measures

Sonect shall maintain effective and transparent procedures for the prompt handling of complaints or grievances received from customers. Sonect shall keep a record of each complaint or grievance as well as the measures taken for the complaint's/grievance's resolution.

The Compliance Department shall maintain all complaints, all relevant correspondence and documents related to complaints, for a minimum period of five years. One copy of the complaint form is archived in the client's file and another copy is kept in a separate file ("complain/grievance file").

At the end of each month the Director inspects the "complain/grievance file" and ensures that the Heads of the Departments have taken all the required actions to prevent repetition of the same complaints/grievances.

The Compliance Analyst shall make sure that procedure is updated to address and prevent any drawbacks in the Sonect procedures that may cause malpractices and respectively Customer's Complaints. The Director shall inform at least once a year the Board of all complaints / grievances received.

11. Final Provision

Along with the final response sent to the complainant Sonect will inform the complainant that he / she may refer the complaint with a copy of the final response from Sonect to the Bank of Lithuania or to other responsible authorities for further investigation if he / she feels dissatisfied with the response received and the settlement conditions offered to him / her.