

COMPLAINT EXAMINATION PROCEDURE

1. GENERAL PROVISIONS

- 1.1. This UAB Nordstreet ("**The company**") complaint handling procedure ("**Order**") establishes the policy of handling complaints in the Company, designed to ensure:
- 1.1.1. quick and fair management process of received complaints that are submitted to the Company;
 - 1.1.2. complaints, materials related to their investigation, answers and information about measures, the storage of which was taken to resolve the complaint;
 - 1.1.3. continuous evaluation of the results of complaints investigation and effective elimination of the causes of complaints;
 - 1.1.4. periodic evaluation and, if necessary, revision of the implementation and effectiveness of this complaint management policy;
 - 1.1.5. appropriate Regulation (EU) 2020/1503 ("**Regulations**"), of the Board of the Bank of Lithuania in 2013 June 6 by resolution no. 03-105 of the approved Rules for Handling Complaints Received by Financial Market Participants ("**Rules**") and the proper execution of other legal acts.
- 1.2. The procedure is prepared in accordance with the requirements of the Regulation, Rules and other applicable legal acts.
- 1.3. This Procedure applies to complaints regarding the services provided by the Company and/or the contracts concluded with the Company, as far as the activities of the crowdfunding platform operator carried out by the Company are concerned. The procedure does not apply to other demands, lawsuits, requests to fulfill the terms of contracts or to provide information, explanations made to the Company by customers and/or third parties.
etc.
- 1.4. When implementing the Company's complaint handling policy established in this Procedure, the requirements of legal acts regulating the legal protection of personal data must be complied with and the personal data processing rules approved by the Company must be followed.

2. CONCEPTS

2.1. Terms used in this Procedure:

- 2.1.1. **The answer**—The Company provides the Applicant with a reasoned explanation in writing regarding the Complaint examined or the decision made.
 - 2.1.2. **The company**—UAB Nordstreet, legal entity code 304565690, registered office at Naugarduko st. 19, Vilnius, Lithuania.
 - 2.1.3. **The client**—a natural or legal person to whom the Company provides crowdfunding platform operator services.
 - 2.1.4. **The applicant**—the Customer who submitted the Complaint regarding the services provided by the Company and/or contracts concluded with the Company.
 - 2.1.5. **Complaint**—The applicant's written appeal to the Company, indicating that his rights or legitimate interests are violated, related to the activities of the crowdfunding platform operator carried out by the Company, as understood in accordance with the Regulation.
 - 2.1.6. **Grievance Officer**—the person who is responsible for handling Complaints in the Company, i.e. collecting information necessary for handling received Complaints, examining Complaints, making decisions and preparing Responses to Applicants.
 - 2.1.7. **Complaints management process**—the Company's actions related to receiving, registering, examining Complaints, informing the Applicant, etc. are set out in this Procedure.
 - 2.1.8. **Magazine**—electronic logbook for registering Complaints submitted to the Company, which contains the information specified in this Procedure.
- 2.2. Unless the context otherwise requires, words used in the Order in the singular include the words used in the plural, and vice versa.
- 2.3. Other terms used in this Procedure are understood as defined in the Regulations, Rules and/or the Company's internal control policy.

3. SUBMISSION OF COMPLAINTS

3.1. The applicant, who believes that his rights or legitimate interests have been violated in his relations with the Company, may submit a Complaint to the Company in writing himself or through a representative in accordance with Appendix No. of this Procedure. 1 prescribed form.

3.2. The complaint must contain at least the following minimum information:

3.2.1. if the Applicant is a natural person - the Applicant's name, address, contact details data;

3.2.2. if the Applicant is a legal entity - Applicant's name, registration number and LEI code (if applicable), registered office address, contact details;

3.2.3. if the Applicant is represented by another person - the name, surname or title of the representative, registration number and LEI code (if applicable), (registered office) address, contact details and the basis of representation (by attaching to the Complaint a power of attorney in the form prescribed by law or another document confirming authorizations of the applicant's representative to act on behalf of the applicant);

3.2.4. Reference to the investment and/or contract to which the Complaint relates;

3.2.5. The essence of the complaint is the actions (inaction) of the Company are being complained about, as far as it relates to the provision of crowdfunding platform operator services, for which the Applicant submits the Complaint and on which he bases his claims;

3.2.6. Date(s) of events to which the Complaint relates;

3.2.7. Place and date of filing the complaint;

3.2.8. a list of documents to be submitted with the Complaint (eg power of attorney, evidence of violation, etc.);

3.3. The complaint must be complete, orderly, legible and written in Lithuanian, English, Latvian, Estonian, Spanish or Polish.

3.4. A complaint to the Company must be submitted in writing in any of the following ways:

3.4.1. by presenting it in person at the Company's headquarters at the address Konstitucijos per. 26, Vilnius (Forum Palace business center, V floor);

3.4.2. by sending by mail (with the help of a courier or other) to the address of the Company's registered office, Konstitucijos per. 26, Vilnius (Forum Palace business center, V floor);

3.4.3. by e-mail: info@nordstreet.lt (The complaint is attached as a separate scanned attachment to ensure text protection and to identify the signature).

4. ACCEPTANCE AND REGISTRATION OF COMPLAINTS

4.1. After the Company receives a Complaint submitted in any way, the employee who accepted the Complaint must forward the Complaint to the person handling the Complaints on the same working day. The person handling the complaints must confirm the receipt of the complaint to the Applicant and decide on its admissibility within 10 working days from the date of receipt of the Complaint by the Company.

4.2. The Company considers the following Complaints unacceptable:

4.2.1. if the submitted Complaint does not meet the requirements set forth in Chapter 3;

4.2.2. if the Company is presented with an identical Complaint or a Complaint that is already being examined by another competent institution or court or for which a decision of the Company has been made or for which a court decision, ruling or order has entered into force;

4.2.3. anonymous Complaints and Complaints submitted to the Company more than three months after the day the Client learned or should have learned about the violation of his rights or legitimate interests, except for those cases when the head of the Company decides to examine the relevant Complaint based on the legitimate interests of the Company.

4.3. If the person examining the complaints decides that the Complaint is not acceptable to the Company, the Applicant is provided with a clear and detailed explanation as to why the Complaint is considered unacceptable and cannot be considered by the Company.

4.4. After the Complaint is accepted for examination by the decision of the person examining the complaints, p. 4.1. the following information is provided to the Applicant by the set deadline:

4.4.1. The identity and contact details of the person handling the complaints, to whom the Applicant can address any questions related to the Complaint, including e-mail address, postal address and telephone number;

4.4.2. The deadline for examining the complaint and submitting the answer to the Applicant.

4.5. Each accepted Complaint must be registered in the Journal by the person handling the Complaints (Appendix No. 2).

4.6. The following data about the Complaint are recorded and processed in the log:

4.6.1. Name and surname or title of the Applicant (if the Applicant is a legal entity);

4.6.2. Address of the Applicant specified in the complaint;

4.6.3. Date and method of receiving the complaint;

4.6.4. Complaint registration number;

4.6.5. The essence of the complaint (brief content);

4.6.6. complained about services or products of the Company, their types;

4.6.7. the date of sending the response to the Applicant;

4.6.8. the final result (decision) of the Complaint.

4.7. It is also recommended to record in the log all other actions of the Company related to the investigation of the Complaint (eg, contacting external lawyers, internal consultations regarding the circumstances indicated in the Complaint, internal inspections, etc.).

5. EXAMINATION OF COMPLAINTS

5.1. The company must take all possible measures so that the Complaint is investigated as quickly and thoroughly as possible. When handling complaints, the company must be guided by the principles of respect for human rights, justice, honesty, reasonableness, objectivity, impartiality, operativeness and other principles established in the Rules and other legal acts of the Republic of Lithuania.

5.2. The person examining the Complaint himself examines the Complaint and writes the Answer or instructs other competent employees of the Company to investigate the circumstances and requirements specified in the Complaint and submit a written draft of the Answer to the person examining the Complaints within the shortest possible time, but no longer than the terms set in point 5.9 of the Procedure.

5.3. The Complaints Examiner may not investigate complaints that are submitted due to the actions (inaction) of the Complaints Examiner or the actions (inaction) of his close relatives (if they work in the Company). In such a case, the person handling the Complaints must recuse himself from the handling of the specific Complaint by informing the Company's manager in writing, who appoints another employee of the Company who does not have a conflict of interest during the handling of the Complaint. A person whose actions (inaction) are complained of, a close relative of such a person or a person directly subordinate to this person cannot be appointed to investigate the Complaint. If the persons provided for in this point believe that, in the case of a specific Complaint, they cannot investigate this Complaint due to other circumstances that cause or may cause a conflict of interests, they must immediately notify the Company's manager about this and withdraw from the examination or investigation of the specific Complaint. If the circumstances provided for in this point become apparent during the Complaint investigation, urgent steps must be taken to eliminate the circumstances causing or likely to cause a conflict of interest and, if necessary, appoint another person to examine or investigate a specific Complaint.

5.4. The person handling the complaint must, among other things:

5.4.1. collect and evaluate all documents and data related to the Complaint in question;

5.4.2. analyze and evaluate historical data related to the Applicant's service;

5.4.3. analyze and evaluate the Applicant's previous Complaints (if any);

5.4.4. evaluate other information available and relevant for the examination of the Complaint (contracts concluded by the Applicant, data related to the fulfillment of obligations to the Company, etc.);

5.4.5. if necessary, to communicate with the Applicant;

5.4.6. if necessary, ask the employee of the Company whose actions are being complained about, or the colleagues of the aforementioned employee, to provide explanations regarding the circumstances of the Complaint;

- 5.4.7. if necessary, to ask the Applicant or his representative to provide additional information necessary for the examination of the Complaint.
- 5.5. Complaints in the Company are processed in writing. In exceptional cases, meetings of the parties may be organized in order to end the dispute peacefully. The meeting can be organized by both the Complainant and the Company.
- 5.6. Complaints are handled by the Company free of charge.
- 5.7. The person handling the Complaint informs the Applicant about all additional actions taken during the Complaint handling and promptly answers the Applicant's reasonable questions regarding the Complaint handling.
- 5.8. The person examining the complaint must examine the Complaint and submit a detailed, motivated, documented Answer to the Applicant as soon as possible, but no later than within 30 calendar days from the date of receipt of the Applicant's Complaint by the Company.
- 5.9. If, due to exceptional reasons beyond the control of the Company, it is not possible to submit the Answer within 30 calendar days, the Company shall inform the Client about this, specifying the reasons for the delay in the Answer to the Complaint and the deadline by which the Applicant will receive the final Answer.
- 5.10. If during the examination of the Complaint the Applicant, who submitted the Complaint, refuses his claim in writing, the person examining the Complaints shall terminate the initiated examination of the Complaint. In this case, a corresponding entry is made in the Journal about the withdrawal of the Complaint and termination of the Complaint examination.

6. ADOPTING THE DECISION AND SUBMISSION OF THE RESPONSE

- 6.1. The response takes into account all the issues specified in the Complaint and provides the reasons for the relevant decision. The decision on the Complaint must be consistent with all previous decisions of the Company on similar Complaints, unless the Company can justify the adoption of different decisions.
- 6.2. The original of the answer together with the attached documents is provided to the Applicant by electronic mail or, at the Applicant's request, in paper form.
- 6.3. The response to the Applicant must include at least:
- 6.3.1. Date of submission of the answer;
 - 6.3.2. motivated Answer;
 - 6.3.3. list of attached documents (if any);
 - 6.3.4. The name, position and signature of the person preparing the response to the Complaint.
- 6.4. The responses to the Complaints of the Applicants must in all cases be coordinated with the Director of the Company.
- 6.5. If the Company is not responsible for carrying out the activities specified in the received Complaint, the Company shall indicate to the Applicant the reasons for refusing to accept and examine the Complaint, as well as, if possible, the financial market participant responsible for examining the relevant Complaint.
- 6.6. If the Company does not satisfy the Applicant's requirements or partially satisfies them and the Applicant is a consumer, the Applicant has the right to apply to the Bank of Lithuania in writing or electronically within 1 (one) year from the date of applying to the Company for a resolution of the dispute. An applicant who has missed the specified deadline for applying to the Bank of Lithuania loses the right to apply to the Bank of Lithuania for the same dispute, i.e. for the same matter (claim to the Company) and on the same basis (circumstances on which the claim is based), and it does not matter that he has applied repeatedly to the Company.
- 6.7. You can learn more about the procedure for consumer disputes with financial service providers on the website of the Bank of Lithuania: <https://www.lb.lt/lt/daugiau-apie-gincius-su-finansiniu-paslaugu-teikeju>.
- 6.8. If the Company does not satisfy the Applicant's requirements or partially satisfies them and the Applicant is not a consumer, the Applicant has the right to apply to the court in accordance with the laws of the Republic of Lithuania.
- 6.9. Examined Complaints with all documentation must be stored in a separate file in a complaint binder or in the Company's electronic data storage system in accordance with the procedure established by law, but for at least 3 years from the date of submission of the final answer to the client.

7. ASSESSMENT OF THE RESULTS OF COMPLAINT INVESTIGATION

- 7.1. In order to identify its weaknesses and potential legal or operational risks, the Company constantly evaluates the results of the Complaints investigation. During this assessment, the employee appointed by the Company's manager:

- 7.1.1. collects information on similar Complaints, as far as the activities of the crowdfunding platform operator carried out by the Company are concerned, performs an analysis of this information in order to determine the fundamental reason for the appearance of complaints, and also submits proposals to the head of the Company regarding the setting of priorities for eliminating the reasons for the appearance of Complaints;
- 7.1.2. assesses whether the fundamental reason for the occurrence of certain Complaints may determine the occurrence of Complaints regarding other services or products provided by the Company, as far as the activities of the crowdfunding platform operator carried out by the Company are concerned;
- 7.1.3. assesses whether the fundamental causes of Complaints can be eliminated, and submits suggestions to the Company's manager on ways to eliminate them;
- 7.1.4. if necessary, takes steps to eliminate identified fundamental causes of Complaints;
- 7.1.5. ensures that information on recurring or systematic causes of Complaints is regularly provided to the Head of the Company so that he can effectively perform his functions.

7.2. The head of the Company, having familiarized himself with the information specified in point 7.1 of the Procedure about the Complaints received by the Company and the results of their examination, and having evaluated the proposals received regarding the priorities of eliminating the causes of Complaints and the methods of their elimination, makes appropriate decisions in order to eliminate the identified fundamental reasons for the occurrence of Complaints.

7.3. Information about the decisions of the Company's manager regarding the elimination of operational deficiencies identified on the basis of complaints and risk management must be stored for at least 3 years in accordance with the procedure established by legal acts.

8. SETTLEMENT OF DISPUTES BETWEEN THE PARTIES TO THE FINANCING TRANSACTION

- 8.1. If the Applicant believes that the other party to the financing transaction has violated his rights or legitimate interests, the Applicant has the right to apply to the Company in the same manner set forth in this Procedure. However, in such cases, the Applicant must indicate that he is applying due to a dispute between the parties to the financing transaction.
- 8.2. After examining the information provided by the Applicant related to the dispute between the participants of the financing transaction, the Company may submit an offer to the parties to the financing transaction regarding a possible way to resolve the dispute within a period of no longer than 35 working days. Such an offer is not binding or binding.
- 8.3. According to Clause 8.1 of the Procedure, the information provided by the Applicant is not considered a Complaint and other provisions applicable to Complaints provided for in the Procedure are not applicable to it. In all cases, the Company tries to act in the best interests of its Clients, but does not assume any responsibility for the submitted dispute resolution proposal, its suitability or consequences.
- 8.4. If it is not possible to resolve the dispute between the parties to the financing transaction according to the procedure provided for in clauses 8.1-8.3 of the Procedure, the dispute between the parties to the financing transaction is further resolved according to the procedure provided by the applicable legal acts.

9. FINAL PROVISIONS

- 9.1. Amendments and/or additions to this Procedure shall enter into force on the day following their adoption, unless a different date of entry into force is specified. The head of the Company must ensure that the Company's employees are timely informed about changes and/or additions to the Procedure.
- 9.2. The Company Manager is responsible for proper implementation and control of the Procedure. The head of the company determines who performs the functions of the person handling complaints.
- 9.3. Complaint handlers must have sufficient skills, knowledge and experience to properly would implement the requirements of this Procedure.
- 9.4. The Complaint Handler must be given access to all information necessary for handling Complaints.
- 9.5. The company collects and, at the request of the Bank of Lithuania, provides information on the number of Complaints received, broken down by the reasons for the submission and the results of the examination.
- 9.6. All employees of the Company shall be familiarized with this Procedure and its amendments by signature and must be guided by it.

COMPLAINT FORM

1.a Data about the applicant:

Name, surname / Title	
Registration code and LEI code (if applicable)	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Telephone number	
email mail adress	

1.b Applicant's contact details (if different from 1.a):

Name, surname / Title	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Telephone number	
email mail adress	

2.a Data on the representative (if applicable) (the appointment of the representative is evidenced by a power of attorney or other official document):

Name, surname / Title	
Registration code and LEI code (if applicable)	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Telephone number	
email mail adress	

2.b Representative contact details (if different from 2.a):

Name, surname / Title	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Telephone number	
email mail adress	

3. Information about the complaint

3.a Investment and/or contract to which the complaint relates (ie investment number, name of project owner/company and/or crowdfunding project, other information about the relevant transaction)

--

3.b Description of the subject of the complaint (clearly indicate the subject of the complaint) Submit documents confirming the specified facts.

3.c Date(s) of events to which the complaint relates

3.d Description of damage, loss or loss suffered (if applicable)

3.e Other comments or information (if applicable)

Date, place and signature of the applicant

Documents attached to the Complaint (check the appropriate box):

<i>Power of attorney or other representation document;</i>	
<i>A copy of the investment agreement related to the complaint;</i>	
<i>Other documents related to the complaint (enter):</i>	

COMPLAINT REGISTRATION JOURNAL									
No.	Complaint receiving date and way	The applicant (name, last name or title)	of the applicant address	Complaint description	Complaints are made services or products, their species	Complaint examination (when examined what examined and etc.)	A reply date	Final Complaint examination the result (solution)	Other notes