



CLIENT COMPLAINT'S HANDLING PROCEDURE

ALLFUNDS BANK, S.A.U



1. TITLE I

CHAPTER I: OBJECT AND SCOPE OF APPLICATION.

Article 1

The purpose of this document is to regulate Allfunds Bank, S.A.U. (hereinafter the "Entity") actual practices to handle all client complaints and meet the requirements established by the current regulation (Law 44/2002, of November 22 on Measures to Reform the Financial System, the Order of the Ministry of Economy 734/2004, of March 11 on the Departments and Services of Financial Institutions' Customers Ombudsman and Customer Service, and Law 2/2011 of March 4 on Sustainable Economy) specifically to the regulations on payment services (Royal Decree-Law 19/2018, of 23 November)¹ and the one that transposes into Spanish law Directive 2013/11/EU, of the European Parliament and of the Council, of 21 May 2013, on alternative dispute resolution for consumer disputes (Law 7/2017, of 2 November).

Article 2

This document has been approved by the Entity's Board of Directors and will be submitted to the verification of the Bank of Spain as supervisor of the Entity. Any additional amendment must also be approved by resolution of the Board and submitted for verification to the Bank of Spain.

Article 3

Complaints and claims object of this document, received from Entity's clients, are those presented by the customers in relation to their legally recognised interests and rights, whether they derive from the agreements, from the regulations on transparency and client protection rules or from good financial uses and practices , in particular from the principle of equity.

They will have the consideration of complaints referring to delays, inattentions or any type of action that is observed in the operation of financial services.

Claims shall be deemed to be those that reveal specific facts referring to actions or omissions that imply, in the opinion of the client, the breach of agreements, of the regulations of transparency and client protection rules or from good financial uses and practices , in particular

¹ However, it should be pointed out that due to the activity carried out by Allfunds Bank relating to the provision of the investment service for the reception and transmission of orders, as well as the auxiliary custody service, it is excluded from the application of the payment services regulations, as established in Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market (SPD2) in its article 3 relating to exclusions, by indicating:

- i) *payment transactions related to securities asset servicing, including dividends, income or other distributions, or redemption or sale, carried out by persons referred to in point (h) or by investment firms, credit institutions, collective investment undertakings or asset management companies providing investment services and any other entities allowed to have the custody of financial instruments*

This exclusion is also included, in similar terms, in Article 4(i) of Royal Decree-Law 19/2018 of 23 November on payment services and other urgent financial measures.

from the principle of equity and that imply for the person who formulates them a damage to their interests or rights, with the intention of obtaining their restitution.

Article 4

The Entity has provided a procedure, which functioning will be developed in the following articles. Clients can present to the Client Complaint's Handling Service their complaints and claims for resolution.

2. TITLE II

CHAPTER I: CLIENT COMPLAINT'S HANDLING PROCEDURE

Article 5

The Entity has created, on the basis of the applicable regulatory provisions, a Client Complaint's Handling Procedure, in order to respond to complaints and claims submitted by those who make use of Entity's financial services.

Article 6

In order to comply with the stipulations and to guarantee the pertinent separation of the Entity's Client Complaint's Handling Service from remaining commercial and operative services, and so decisions can be taken independently avoiding any kind of conflict of interest, this Service will carry out their functions under the direct and immediate dependence of the Audit and Risk Committee of the Entity's Board of Directors.

However, all departments of the Entity must provide Client Complaint's Handling Service all the information and documents requested in connection with the exercise of its functions

Article 7

Client Complaint's Handling Service will be responsible of attending the complaints and claims related to article 3 that are presented to them and that arise from services provided by the Entity in the Spanish territory.

The Client Complaint's Handling Procedure will only accept claims presented within the following two years or the one established by the regulations in force at any given time, to the date on which the event causing the complaint was discovered.

Article 8

The Entity will adopt the appropriate measures to ensure that the transmission of information required by the Client Complaint's Handling Service to the rest of the areas and departments of the organization subject to this document, respond to speed, safety, efficiency and coordination standards.

Article 9

The Entity will provide the Client Complaint's Handling Service with the adequate human, material, technical and organizational resources to carry out its functions.

Article 10

Necessary measures will be taken so that the personnel belonging to the Client Complaint's Handling Service have adequate knowledge of the regulations on transparency and protection of financial services clients.

CHAPTER II: ROLES AND COMPETENCES

Article 11

The Client Complaint's Handling Service will have the duty to respond to complaints and claims submitted by the clients who receive Entity's financial services, autonomously avoiding any conflict of interest in compliance with this document and without limitation other than the interests and rights that the law expressly acknowledges.

Article 12

The Client Complaint's Handling Service may refuse to acknowledge those complaints or claims that are being heard or have been resolved in an administrative, arbitral or judicial procedure.

Article 13

Any department or office of the Entity that receives a complaint or claim and cannot be resolved in favor of the client within the scope of its usual activity, must immediately forward it to the Client Complaint's Handling Service and inform about it the claimant.

Article 14

The Client Complaint's Handling Service will also be available to all departments of the Entity that require their intervention, in order to make internal decisions so that the organization can apply the correct implementation of the services, from the perspective of good practices.

Article 15

Regardless of the development of the annual report, subject of another chapter of this document, the Service may elaborate periodic statistical reports of the complaints received, either by concepts, by offices or by products subject to complaint or claim in order to collaborate in complying with banking orthodoxy.

Article 16

The Client Complaint's Handling Service, through its responsible, will serve as a connection to the financial supervisors' (Bank of Spain, Spanish Commission of the Securities Market) Claim Services as well as consumer organizations or customer associations.

CHAPTER III: SERVICE DIRECTOR

Article 17

The Client Complaint's Handling Service Director must be a professional with commercial and professional honorableness, and with the appropriate knowledge and expertise to perform the corresponding functions in compliance with this document and the applicable regulatory directives, in all matters related to customer care and defense. Its designation will correspond to the Entity's Board of Directors in accordance with what is legally established.

Article 18

The Client Complaint's Handling Service Director shall be terminated if during the exercise of his/her position any circumstance occurs which, once known by the Entity, entails the loss of the necessary commercial and professional honorability.

The position of Client Complaint's Handling Service Director will be incompatible with the exercise or rendering of professional services in any other financial institution.

Article 19

The Client Complaint's Handling Service Director appointment and any variation in the position will be communicated by the Entity to the financial supervisors' (Bank of Spain, Spanish Commission of the Securities Market) Claim Services and to the corresponding supervisory authorities.

Article 20

The term of office is established in two years, renewable for equal periods, without limitation, without prejudice to the right of withdrawal that the Board of Directors may exercise at any time by means of an agreement triggered by objective and serious causes for termination.

3. TITLE III

CHAPTER I: DUTY OF INFORMATION

Article 21

The Entity makes available to all customers in the office as well as on the website where regulation requires it, the following information:

- The existence of the Client Complaint's Handling Procedure, indicating its domicile and electronic address.

- The obligation to respond to complaints and claims presented by clients subject to this document within two months after its submission to any area of the Entity or 15 working days in the case of claims for payment services².
- The regulatory references to the financial supervisors' (Bank of Spain, Spanish Commission of the Securities Market) Claim Services, the specification of their postal and electronic address and the need to use the Client Complaint's Handling Procedure to be able to formulate complaints and claims.
- The existence of this document.
- The references to transparency and financial services' customer protection regulations.

4. TITLE IV

CHAPTER I: CLAIM PRESENTATION, PROCESSING AND RESOLUTION

Article 22

Presentation of complaints or claims must be made, personally or through representation, by paper or by computer, electronic or telematic means provided, where possible to be read, printed and preserved. The use of computer, electronic or telematic means must comply with the requirements laid down by Law 59/2003 of December 19, on electronic signature.

The document will state:

- Name, surname and address of the interested party and, if applicable, of the person who represents him or her duly accredited; number of the national identity document or passport for natural persons and, in case of legal entities, data related to public registry.
- Concrete reason for the complaint or claim, clearly specifying the issues on which the judgment is requested.
- Office or offices, department or service where the events subject of the complaint or claim took place.
- Place, date and signature.

The claimant may provide as much documentation as it deems pertinent to support his/her complaint or claim.

Complaints may be lodged to Client Complaint's Handling Service, in any Entity's office or at the e-mail address. However, these may only be presented once by the interested party, without their reiteration being required by different bodies of the Entity.

The Client Complaint's Handling Service has a maximum period of 2 months in general and 15 working days in the case of claims for payment services³ to resolve claims in accordance with its procedure. In the event of disagreement with the resolution or if the indicated period has

² See note 1

³ See note 1

elapsed without any pronouncement having been issued, the customer may make a claim to the Claims Services of the supervisors.

Article 23

The claimant, if applicable, will notify the Client Complaint's Handling Service of the requirement of any ongoing procedure before arbitral, judicial or administrative bodies.

Article 24

After the initial analysis of the complaint or claim received, if it is considered that it does not comply with the necessary requirements for its admission, it will be notified within ten days to the complainant in order to complete the omissions.

The period used by the claimant to correct the errors referred to in the previous paragraph shall not be included in the calculation of the period for resolving the claim.

The following will be causes to rejecting the admission to process of the complaints and claims:

- a) When essential data for processing is omitted, including those cases in which the reason triggering the complaint or claim is not specified.
- b) When complaints or claims, whose knowledge is competition from the administrative agencies, by arbitration or judicial, or the same one is slope of resolution or litigation or the subject has already been resolved in those bodies.
- c) When the facts, reasons and requests made regarding the issues which are the subject of the complaint or objection do not refer to specific operations or do not meet the requirements established in article 3.
- d) In the case of complaints or objections that have already been resolved in prior claims, submitted by the same customer with regard to the same facts.
- e) When the term for submission of complaints and objections established in article 7 has elapsed.

If the reasons for non-admission are maintained after the response to the request made to the claimant, the decision adopted will be communicated properly reasoned.

Once the file is closed, if in the future the claimant solves the incident that has led to the non-admission of complaints and claims, a new file will be opened.

Article 25

The Client Complaint's Handling Service will collect from any branch, instance or department, all data, clarifications, reports or evidence considered pertinent to adopt its decision; being these obliged to provide the requested material in the least possible time so that the Client Complaint's Handling Service can respond within the established legal deadlines.

Article 26

If, in view of the complaint or claim, the Entity were to correct its situation with regard to the customer to the latter's satisfaction. The Entity will communicate it to the service attaching as justification the corresponding documentation. In these cases of search, as well as in the express withdrawal of the interested party, will proceed to close the complaint or claim without further processing.

Article 27

The file opened with the complaint or claim received must end, by regulatory imperative, within a maximum period of two months or 15 working days in the case of claims for payment services from the date of submitting the claim within the Entity. Once this period has ended, a written copy will be sent by mail or by computer, electronic or telematic means to the claimant of the affirmative or negative decision adopted.

The maximum term of two months or 15 working days will begin to run from the moment in which the complaint or claim is received by the Client Complaint's Handling Service or in any of the Entity's offices. In the event that the complaint or claim is received at any of the Entity's offices, it will be transferred to the Client Complaint's Handling Service as soon as possible.

Article 28

The decision must be reasoned and must contain clear conclusions regarding the request formulated in each complaint or objection, on the basis of contractual clauses, applicable regulations on transparency and customer protection, as well as financial good practice and customs.

Likewise, in the event that the decision differs from the criteria stated in similar prior cases, reasons must be provided to justify this difference.

The resolution of the Client Complaint's Handling Service will be binding for the Entity but not for the claimant who, if accepted, will not have to give up any subsequent right or instance in defence of their interests.

Article 29

Decisions which terminate the processing procedures of complaints and claims should expressly mention the claimant's power, in the event of disagreement with the judgment, to go to the financial supervisors' (Bank of Spain, Spanish Commission of the Securities Market) Claim Services which corresponds. The claimant will also have this right once a two month period has passed without having received a reply to the demand made to the Client Complaint's Handling Service.

Article 30

The client will not be obliged to accept the resolution favorable to his/her interests, having the right to apply to other bodies.

CHAPTER II: RELATIONSHIP WITH FINANCIAL SUPERVISORS' CLAIM SERVICES

Article 31

The Client Complaint's Handling Service must meet the requirements that financial supervisors' (Bank of Spain, Spanish Commission of the Securities Market) Claim Services may present to them in the exercise of their responsibilities, within the terms that they establish, in accordance with their regulations.

The Entity will adopt the necessary decisions to facilitate the transmission of data and documents that are fundamental in the exercise of its functions with the financial supervisors' Claim Services, so that these are made by telematic means through the use of electronic signature, in accordance with article 4 of Law 59/2003, of December 19, and its implementing regulations.

Article 32

Complaints and claims by payment service users which relate to their legally recognised interests and rights and which arise from alleged breaches by payment service providers⁴ as referred to in Article 5.1 of the provisions of Royal Decree-Law 19/2018, its implementing regulations, standards or good financial practices and uses that are applicable will be resolved, when created, by the alternative resolution entity in the field of financial activity referred to in the first additional provision of Law 7/2017, of 2 November, which incorporates into Spanish law Directive 2013/11/EU, of the European Parliament and of the Council, of 21 May 2013, on alternative dispute resolution for consumer disputes

5. TITLE V

CHAPTER I: ANNUAL REPORT

Article 33

Before the end of the first quarter of each year, the Client Complaint's Handling Service shall submit an explanatory report to the Entity's Board of Directors on the performance of its function, during the preceding fiscal year, containing at least the following:

- A statistical summary of the complaints and claims handled, information on the number of same, acceptance for processing, reasons for non-acceptance, causes and matters raised in the complaints and claims, and any relevant amounts.
- A summary of the decisions adopted, indicating whether the same are favorable or unfavorable for the claimant.
- General criteria contained in the decisions.
- Recommendations or suggestions stemming from the experience derived from this exercise, with the objective of achieving a continuous improvement of the quality of the service provided in accordance with the objective of operating correctly from the perspective of financial best practices by the Bank.

Part of the summary report, according to standardized criteria, will be integrated into the Entity's annual report.

⁴ See note 1

6. TITLE VI

REGULATION MODIFICATION

Article 34

If it is necessary to modify this Policy, the amendment will not come into force until its approval by the Board of Directors, and until it counts with the positive verification of the Department of Market Conduct and Claims of the Bank of Spain .

TRANSITORY PROVISION: ENTRY INTO FORCE

This Policy will enter into force once approved by the Board of Directors and after the positive verification of the Department of Market Conduct and Claims of the Bank of Spain.