



**MUNDUS**  
ASSET MANAGEMENT

**APPROVED**

**1<sup>st</sup> March, 2016 Executive Order No. 2016/03/01-1**

## Client complaint processing rules

### I. GENERAL PROVISIONS

1. Client Complaint Processing Rules (hereinafter - Rules) are intended to ensure prompt and fair processing of Mundus Asset Management's (hereinafter - Company) client complaints, as well as preservation of the complaints and means of their solution.
2. The Rules adhere to the requirements of the Markets in Financial Instruments Act of the Republic of Lithuania and the Financial Markets Participant's Received Complaints Processing Rules of the Bank of Lithuania. Terms found in the Rules are interpreted as defined in regulations listed in this Article.
3. The Rules are accessible at the website: [bridge.invl.com](http://bridge.invl.com).
4. Upon applicant's request, the Rules and any other information related to the complaint processing process required by the applicant are provided in writing.

### II. COMPLAINT REGISTERING AND PROCESSING

5. Complaints to the Company are submitted by e-mail [bridge@invl.com](mailto:bridge@invl.com). The information required in the complaint is listed in Article 10 of the Rules.
6. The applicant has the right to address consumer protection issues to the Supervision Service of the Bank of Lithuania.
7. Complaints are processed by the Company employee responsible for client relations with the support of other Company employees relevant for the specific complaint. All Company employees participating in complaint processing abide by the Rules.
8. While processing a complaint Company's employees must adhere to the principles of respect for human rights, justice, fairness, reason, objectivity, impartiality and expedition.
9. Complaints received by the Company are recorded in an electronic registry.
10. Complaint registry must include the following data about the complaint:
  - 10.1. name and surname or title of the applicant;
  - 10.2. applicant's address as included in the complaint;

- 10.3. date and means of the received complaint;
  - 10.4. essence of the complaint (short summary);
  - 10.5. financial market participant's services or products, their categories, that are the focus of the complaint;
  - 10.6. date of the answer to the applicant;
  - 10.7. final result of the complaint processing (solution).
11. The complaint processing employee of the Company must:
- 11.1. collect and assess all documents and data related to the complaint being processed;
  - 11.2. communicate with the applicant clearly and comprehensively;
  - 11.3. process the complaint and provide a solution as soon as possible, but no later than 30 calendar days from receiving the complaint. In exceptional cases, when the complaint cannot be processed within the period set in this Article, Company employee must inform the applicant about the circumstances of the delay and the expected term of the solution for the complaint;
  - 11.4. in the response to the applicant when the complaint is not met or met in part state the motives for refusal to meet the complaint and list other means of applicant's interest protection, including, but not limited to available possibilities for arbitration and litigation;
  - 11.5. always respond to the applicant in writing.
12. The Company stores the complaints, processing materials, documents with solutions to specific complaints and answers provided to the applicants for not shorter period than 3 years after the date of the final response to the applicant.

### III. ASSESSMENT OF COMPLAINT PROCESSING RESULTS

13. In order to identify shortcomings and potential legal and operational risk, Company's director or an appointed employee at least once a year assesses the results of complaint processing. During this assessment:
- 13.1. information on similar complaints related to a specific service or product is gathered and analysed in order to determine the main causes of the complaints and set priorities for eliminating these causes;
  - 13.2. it is judged if the main causes of certain complaints could lead to complaints related to other services or products;
  - 13.3. it is judged if the main causes of complaints can be eliminated and methods for their elimination are determined;
  - 13.4. if necessary, Company's director or an appointed employee mandates Company's employees to eliminate the main causes of complaints;
  - 13.5. Company's director or an appointed employee ensures that information on regular or systemic causes of complaints is regularly submitted to the Company's director in order to efficiently perform his duties.
14. Information on management's decisions regarding elimination of Company's shortcomings and risk management identified on the basis of complaints is stored for not shorter period than 3 years.

### IV. FINAL PROVISIONS

15. Company no later than 2 months after the end of calendar year submits to the Bank of Lithuania in electronic form information on received complaints regarding financial products (by e-mail [produktai@lb.lt](mailto:produktai@lb.lt) or via the File Exchange System (information should be submitted

under the section “7. Information on financial products“)). In case the Company received no complaints during the reporting period, the Bank of Lithuania is informed by an electronic message at the aforementioned e-mail.

16. The Company stores and at the request of Bank of Lithuania provides information on the number of received complaints, distribution by causes and processing results (received complaints, processed complaints, met complaints, partially met complaints).
17. Information provided by e-mail, fax and other telecommunication means that allow proving the fact of information provision is considered in compliance of the requirement of the Rules to provide information in writing.
18. The Rules are reviewed and, if necessary, revised at least once a year.