

1. INITIAL PROVISIONS

- 1.1 The Complaint Procedure put in place by PARTNERS INVESTMENTS, o.c.p., a.s. ("PI" or the "Company") determines the steps to be taken when a Client submits a complaint in connection with PI's provision of investment services and ancillary services.
- 1.2 The Complaint Procedure was adopted in accordance with Article 26 of Commission Delegated Regulation (EU) No. 2017/565, Methodological Guideline No. 2/2014 of the Financial Market Supervision Department of the National Bank of Slovakia (NBS) of 30 September 2014 and the internal regulation Complaint Settlement Policy.
- 1.3 Each Client, or their authorized representative, may file a complaint, with the Client's signature as the principal attached to the power of attorney to be officially authenticated. A complaint means an expression of dissatisfaction addressed to PI by a natural person or legal entity in connection with provision of services or performance of activities subject to supervision by the NBS under Act 566/2001 on securities and investment services, as amended.
- 1.4 The Complaint Procedure does not apply where PI has received a complaint concerning an entity other than PI. In such a case, PI will send a reply to the complainant and inform them about the competent entity that has complained subject to the complaint.
- 1.5 The Complaint Procedure does not apply where PI has received a complaint concerning the services and activities other than those subject to the supervision by the NBS. In such a case, PI will send a reply to the complainant stating that the complaint does not concern the services or activities performed by PI and inform the Client about the relevant entity (provided that PI knows who it is).

2. FILING A COMPLAINT

- 2.1 The Client may file a complaint in writing (a letter, fax, e-mail) or orally. Any emailed complaint will be printed out by the Company. An orally submitted complaint will be put in a written record to be signed by the complainant and authorized representative of the Company. The complainant may only submit an oral complaint in person at the Company's premises. Use of telemcommunications to submit an oral complaint is not permitted.
- 2.2 Each complaint shall contain data identifying the Client:
 - a) Name (business name),
 - b) Birth number (organization ID number),
 - c) Address (registered office),

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- d) Client's contact data (e.g phone number, e-mail),
- e) Complaint submission date.

In addition, the Client shall state in the complaint specifically, understandably, correctly and precisely what the complaint is along with relevant dates, numbers and amounts and shall prove their claims in a trustworthy manner, particularly by submitting legally relevant evidence obtained by the Client at their expense. In the complaint, the Client shall also state the rights they are exercising against PI thereby.

- 2.3 Should the Client's complaint lack any of the particulars specified in Clause 2.2 of this Article, PI will call upon the Client to provide relevant data within 30 days from service of a notice to that effect. Should the Client fail to remedy the shortcomings in the complaint within the period of time under the preceding sentence, PI shall not be obliged to handle their complaint and examine its justification, which PI will draw attention thereto in its notice. If the Client removes the shortcomings in their complaint, the period of time for handling it shall commence in accordance with Article 3 hereof.
- 2.4 The Client shall provide PI with all assistance necessary to clarify and review the submitted complaint. Should the Client refuse such cooperation, despite having been requested by PI to do so, PI will not be obliged to conduct any further inquiry regarding the complaint or examine its justification and PI will draw attention thereto in its notice).

3. COMPLAINT SETTLEMENT TERMS

- 3.1 The Company shall settle a Client's complaint within thirty (30) days from the day of its submission by the Client. If a Client's complaint does not contain the particulars under Clause 2.2 of Article 2 hereof, the period of time determined for settling the complaint shall commence as of the day when the Client has removed shortcomings thereto. In exceptionally complicated cases, the Company shall settle a Client's complaint within ninety (90) days from the day of its submission by the Client and inform the Client thereof prior to expiry of the period determined for settlement of the complaint under the first sentence.
- 3.2 Where settlement of a complaint requires cooperation or the opinion of another entity, the period of time for settlement of the complaint shall be suspended for the time during which that entity deals with the complaint.

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4. COMPLAINT SETTLEMENT PROCEDURE

- 4.1 Complaints submitted by the Company's Clients are handled by the Company's department put in charge of the complaint according to its content and substance. The employees of the Company's department competent to settle a Client's complaint are entitled to request other departments of the Company to provide cooperation and assistance in dealing therewith.
- 4.2 The Company will determine the department that will settle a complaint based on its content or substance.
- 4.3 A first-instance decision on a complaint will be signed either by the manager of the Company's department in charge of complaint settlement or the CEO.
- 4.4 Second-instance decisions on a complaint will be signed by CEO or members of the Executive Board.
- 4.5 In handling complaints, PI applies the following procedures:
- a) PI collects and reviews all relevant evidence and information pertaining to the complaint;
 - b) PI communicates with the complainant in a clear, simple and understandable manner;
 - c) PI provides the complainant with a reply to their complaint within the period of time set out in Article 3 hereof;
 - d) Where PI rejects a complaint in part or as a whole, it will fully explain its position to the complainant and inform them about further possibilities for enforcement of their complaint.

5. FIRST-INSTANCE DECISIONS ON COMPLAINTS

- 5.1 Decisions regarding a complaint shall be in writing and may be delivered to the Client either as a letter or e-mailed. The decision on a complaint shall state whether it has been accepted as justified or rejected by the Company. Where the Company accepts a Client's complaint, the decision will contain the reasoning and the manner in which the remedy requested by the Client in the complaint will be implemented. Where the Company rejects a Client's complaint, the decision will contain the reasoning explaining why the complaint has not been accepted.
- 5.2 Should a Client request that the Company provide information, or where the nature of a Client's complaint makes it impossible to decide whether to accept or reject the complaint, the Company's reply to the Client in which the Company provides the Client with the information requested by them, or any other reply to the Client's complaint, will be deemed a decision under Clause 5.1 of this Article.

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6. SECOND-INSTANCE REVIEW OF A DECISION ON A COMPLAINT. REPEATED COMPLAINTS.

- 6.1 If a Client's complaint is not upheld in the Company's first-instance decision, the Client can lodge an appeal against it. The Company's CEO is responsible for reviewing the repeated complaint and will also review the original complaint and decide upon the lodged appeal. Should the CEO accept the repeated complaint, the first-instance decision will be overruled and the CEO shall state in their decision the manner in which the remedy requested by the Client will be implemented. Should the CEO reject the Client's repeated complaint, the CEO's decision is final.
- 6.2 Decision-making by the CEO on lodged appeals is reasonably governed by Clause 5.2 of Article 5.
- 6.3 The procedure under Clauses 6.1 and 6.2 shall apply where the Executive Board decides on a lodged appeal of a complaint instead of CEO.
- 6.4 Should PI take a position in respect of a complainant which does not fully comply with the complainant's requirements, PI will undertake to provide the complainant with a full account behind its position and inform them about further possibilities for handling their complaint, for instance through an alternative dispute resolution mechanism or the relevant national authorities.

7. PROVISION OF INFORMATION TO COMPLAINANTS AND THE PUBLIC.

- 7.1 At the complainant's request, PI will provide information about the steps taken by the supervised entity in settling complaints.
- 7.2 PI publishes on its website the current version of the Complaint Procedure and accurate, clear and current information about complaint settlement procedures available to both complainants and internet users.

8. OUT-OF-COURT SETTLEMENT OF COMPLAINTS

- 8.1 Non-professional clients may use an online dispute resolution platform ("DRP") to settle their complaints in the language chosen by them. Non-professional clients may make use of the DRP available at: <http://ec.eu-ropa.eu/consumers/odr/> as an alternative to settle their complaints. To submit their complaints, non-professional clients would complete an electronic complaint form at the DRP. The information submitted by them must be sufficient to determine the competent alternative dispute resolution entity. Non-professional clients may attach documents supporting their complaints.

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- 8.2 Another of out-of-court dispute resolution method is alternative resolving of a dispute between a non-professional consumer Client and the Company by an alternative dispute resolution entity. Pursuant to Section 24 (1) (a) of Act 391/2015 on alternative consumer dispute resolution and amendment of certain laws (the "Act"), the Ministry of Economy of the Slovak Republic publishes at <http://www.economy.gov.sk/obchod/ochrana-spotrebitela/alternativne-riesenie-spotrebitelskych-sporov-1/zoznam-subjektov-alternativneho-riesenia-spotrebitelskych-sporov> a list of alternative dispute resolution entities. Clients have the right to file an alternative dispute resolution application with an alternative dispute resolution entity where the Company has rejected or failed to settle a complaint within the period of time under Article 3 hereof. The objective is to conclude a written agreement on resolution of the dispute between a Client and the Company.
- 8.3 The third way of out-of-court dispute resolution is to appoint an impartial third-party mediator. The Client and the Company will seek a resolution through a mediator at an informal and non-public meeting. Mediation is conditioned by both parties desiring to come to an agreement. A mediator is a natural person registered in the List of Mediators maintained by the Ministry of Justice of the Slovak Republic. The Ministry of Justice of the Slovak Republic publishes the List of Mediators at <https://www.justice.gov.sk/Stranky/Nase-sluzby/Civilne-pravo/Mediatori/Uvod.aspx>. Mediation, basic principles, organization and the outcome of mediation are governed by Act 420/2004 on mediation and on the amendment of certain laws, as amended.

9. FINAL PROVISIONS

- 9.1 Should there be any changes in legislation or the need for a more efficient complaint settlement process to be put in place, PI is entitled to unilaterally amend this Complaint Procedure at any time.
- 9.2 PI will publish all written amendments to the Complaint Procedure on the Company's website form prior to the effective date thereof, but no later than on their effective date.

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