Procedure for Handling Client Applications and Complaints

Investment Brokerage Company “Alphinox Quality”

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Approval

APPROVED — Dmitrijs Bauļins, Chairman of the Supervisory Board.

APPROVED — Jūlija Bistrova, Chairwoman of the Management Board; Jānis Libeks, Member of the Management Board; Andrejs Tumanovs, Member of the Management Board.

1. Purpose

1.1. The purpose of the Procedure for Handling Client Applications and Complaints of the joint-stock investment brokerage company “Alphinox Quality” is to establish the procedure by which a Client may submit Complaints concerning the Services provided by the Company; the procedure for registering and examining Complaints; and the procedure for responding to Clients regarding Complaints submitted.

2. Terms and abbreviations used

2.1. Responsible Employee — an employee of the Company designated by its Management Board to be responsible for examining a Complaint, investigating its contents and preparing a response.

2.2. FCMC — the Financial and Capital Market Commission, address: Kungu iela 1, Riga, LV-1050, Latvia.

2.3. FCMC Recommendations — Financial and Capital Market Commission Recommendations No. 11, “Recommendations on the procedures for examining and registering complaints received by credit institutions, cooperative credit unions, investment brokerage companies, investment management companies, alternative investment fund managers, payment institutions and electronic money institutions, and for providing information about complaints”.

2.4. Client — a natural or legal person to whom the Company provides investment services and/or ancillary investment services.

2.5. Law — the Financial Instruments Market Law of the Republic of Latvia.

2.6. Service — an investment service or ancillary service provided by the Company within the meaning of the Financial Instruments Market Law of the Republic of Latvia.

2.7. Procedure — this “Procedure for Handling Client Applications and Complaints”.

2.8. Company — the joint-stock investment brokerage company “Alphinox Quality”.

2.9. Complaint — a submission made to the Company by a Client or prospective Client in connection with a Service provided or offered by the Company.

2.10. Regulation — Commission Delegated Regulation (EU) 2017/565 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.

3. General provisions

3.1. A Client may submit a written Complaint concerning the Company's Services free of charge.

3.2. A Client is entitled to submit a complaint to the Consumer Rights Protection Centre regarding breaches of consumer protection legislation if they relate to the provision of the Company's Services.

3.3. The FCMC provides Clients with opinions on complaints concerning breaches of the Law and other regulatory enactments connected with the provision of investment services.

3.4. This Procedure is available at the Company's office at Dzirnavu iela 42, Riga, LV-1010, Latvia, and on the Company's website: www.alphinox.com.

3.5. The Company ensures that Clients' Complaints are registered and examined in accordance with the FCMC Recommendations, the Law and the Regulation.

3.6. The Company's activities are supervised by the FCMC.

4. Procedure for submitting a Complaint

4.1. A Client may submit a Complaint in writing:

4.1.1. by sending it to the Company's office at the postal address: Dzirnavu iela 42, Riga, LV-1010, Latvia;

4.1.2. by sending it to the Company's email address: j.bistrova@alphinox.com.

4.2. When submitting a Complaint, the Client must specify:

4.2.1. the addressee (the Company);

4.2.2. for a natural-person Client, their given name, surname, personal identity number and place of residence;

4.2.3. for a legal-person Client, its name, registration number and registered address;

4.2.4. the subject matter, substance and requested remedy of the Complaint;

4.2.5. the date and place of preparation of the Complaint;

4.2.6. the personal signature of the complainant or their representative and any attached documents substantiating the Complaint (if any);

4.2.7. contact details (telephone number, email address and postal address).

5. Procedure for registering a Complaint

5.1. The Responsible Employee registers Complaints received from Clients in accordance with the requirements of the Company's Records Management Procedure, ensuring that the following information is recorded:

5.1.1. the date of receipt of the Complaint and the date on which the response was sent;

5.1.2. information about the complainant;

5.1.3. the substance of the Complaint;

5.1.4. information about the actions taken to examine and resolve the issues raised in the Complaint (including whether the Complaint was justified or unjustified, and a description of any subsequent action by the Company after examining the Complaint);

5.1.5. the date on which the relevant actions were taken.

6. Examination of Complaints and preparation and dispatch of responses

6.1. The Responsible Employee examines the Complaint and, where necessary, involves other Company employees.

6.2. The Responsible Employee informs the Company's Management Board of the substance of the Complaint, whether it is justified, and what measures have been taken or need to be taken to resolve the issue raised.

6.3. The Responsible Employee prepares the response to the Client, taking into account the recommendations of the Company's Management Board.

6.4. The response is prepared in the language in which the Complaint was submitted.

6.5. The prepared response is reviewed and approved by a member of the Company's Management Board.

6.6. The Company provides the Client with a written response within 30 (thirty) calendar days of receiving a written Complaint concerning the Services.

6.7. If the time limit specified in Clause 6.6 cannot be met due to objective circumstances, the Company is entitled to extend it by notifying the Client in writing, explaining the reasons for the delay and indicating the expected date for providing the response.

6.8. The Company employee performing records-management duties sends the prepared response to the Client in accordance with the Company's Records Management Procedure.

7. Training and supervision of the Procedure

7.1. The Company familiarises the following persons with this Procedure:

7.1.1. the Responsible Employee;

7.1.2. the Company employee performing records-management duties;

7.1.3. employees entering into employment relationships with the Company.

7.2. By an appropriate order, the Company's Management Board appoints an employee of the Company's Compliance Control Department whose responsibilities are:

7.2.1. to continuously monitor and assess the Company's compliance with and the effectiveness of measures and internal rules in the field of Service provision;

7.2.2. to provide advice and assistance to Company employees involved in providing Services;

7.2.3. at least once a year, to report to the Company's Management Board on the implementation and effectiveness of the overall control environment for Services and related activities, on identified risks and complaints-management reports, and on measures already taken or planned;

7.2.4. to oversee the process for handling Client applications and complaints.

7.3. The Company continuously monitors the effectiveness of this Procedure and reviews it at least once a year, making amendments where necessary.

7.4. The Chairperson of the Company's Management Board is responsible for reviewing and updating this Procedure.