

OTP BANKA SRBIJA
BOARD OF DIRECTORS OF THE BANK
DATE: 29.03.2023.

By virtue of Article 26, paragraph 1, item 20 of the Articles of Association of OTP banka Srbija as of 31.01.2022, the Board of Directors of the Bank adopts the following:

RULEBOOK ON HANDLING CLIENT COMPLAINTS

1. GENERAL PROVISIONS

Article 1

This Rulebook on Handling of Client Complaints (hereinafter: Rulebook), which constitutes an integral part of the Rules of Procedure for Investment Services and Activities and Ancillary Services of OTP banka Srbija (hereinafter: Rules of Procedure) governs the proceeding of OTP banka Srbija in the procedure under client complaints, through establishing, implementing and maintaining efficient and transparent procedures for quick resolving of client complaints, i.e. of prospective clients.

2. TERMS

Article 2

Terms and expressions used in this Rulebook have the following meanings:

- **Law** means the Law on the Capital Market (Official Gazette of the Republic of Serbia, No. 129/2021);
- **Securities Commission** (hereinafter: "**the Commission**") is an independent regulatory and supervisory institution of the Republic of Serbia that exercises public powers in accordance with the competences prescribed by the Law;
- **Credit institution** is an entity licensed in accordance with the provisions of the law regulating prudential rules for credit institutions; that is, in the Republic of Serbia, a credit institution is an entity licensed in accordance with the provisions of the law regulating banks, i.e., in accordance with the provisions of the law regulating credit institutions;
- **Bank - OTP banka Srbija** is a credit institution in terms of the Law, licensed by the National Bank of Serbia to carry out banking activities in accordance with the Law on Banks and licensed by the Securities Commission to carry out the activities of an investment company;
- **Capital Market Department** is a separate organizational part of the Credit Institution intended for the provision of investment services from Article 2, Paragraph 1, Items 2) and 3) of the Law. As part of its business activities, the Bank, that is, the Capital Market Department provides, within its competences, ancillary services from Article 2, Paragraph 1, Item 3), Sub-items (2) and (4) of the Law, which do not require the Commission's permission;
- **Client** is any legal or natural person to whom the Bank provides its Services;

3. HANDLING OF CLIENT COMPLAINTS

Article 3

The Bank shall establish, apply, maintain, and regularly update effective, efficient and transparent procedures for the Bank's acceptable and up-to-date dealing with complaints from clients or potential clients and ensure the possibility of out-of-court settlement of consumer disputes related to the provision of the Services, in accordance with the laws governing mediation in dispute resolution and arbitration.

The Bank is obliged to keep records on complaints received and measures taken for the resolution thereof, and to keep documentation on all complaints and measures taken based on them, in the manner and as prescribed by the Law, by-laws of the Commission, Rules of Procedure, this Rulebook and the Bank's internal acts.

Article 4

Complaints from clients due to possible improperly performed work by the Bank in connection with the provision of the Services are regulated in detail by the Bank's internal act.

Bank clients may complete, sign and submit complaints: in person, electronically or by post mail to address of Bank's registered office. Clients can file complaints regarding the Bank's actions to the official e-mail address: prigovori@otpbanka.rs.

The Bank shall publish on the bank's website details of the complaint handling procedure. Such details include information on the complaint management policy and contact information of the Bank's competent organizational unit for complaint management.

Information shall be provided to clients, i.e. prospective clients upon request or when confirming receipt of complaint, confirmation of which is provided to the client immediately upon receiving the complaint, and by no later than the end of business day.

The Bank does not charge a fee for receiving and processing a complaint, as well as for conducting an internal investigation of a complaint.

The Bank communicates with clients and/or potential clients when resolving their complaints, in a clear manner, using simple, easily understandable language and shall respond to the complaint without any unnecessary delay.

The Bank is obliged to check all the circumstances that could affect the received complaint and respond to the client as soon as possible, no longer than three days from the day of receiving the complaint.

The Bank shall submit answer relevant to the clients' complaints, i.e. prospective clients' complaint. It shall inform clients, i.e. prospective clients of the possibilities at their disposal, including that they may refer the complaint to an entity for alternative settlement of disputes (ASD Entity), i.e. that the client may file a lawsuit (*civil lawsuit*) to the competent court.

If in the procedure of verifying circumstances that gave rise to the client's complaint the Bank becomes of knowledge contrary to the provisions of the Rules of Procedure, suspicion of market manipulation, misuse of inside information and similar, the Bank is obliged to inform the Commission thereof with the provision of information on complaints and resolution thereof.

The Bank is not obliged to act upon anonymous and incomplete complaints.

If a client submits an incomplete complaint, the Bank is obliged to inform the client of the necessary data for the purpose of identification and verification of the complaint, and after the submission of the necessary data by the client, to check the allegations and submit a response to the Client.

Article 5

The Bank shall keep records and documentation on all complaints received and measures taken based on them for at least seven years, in the manner prescribed by the Rules of Procedure, this Rulebook and the Bank's internal acts.

Article 6

When handling client complaints, the Bank shall adhere to all principles set out by the Law, by-laws of the Commission, Rules of Operation, this Rulebook and other internal acts of the Bank, and in particular but not limited to, in terms of data confidentiality.

Article 7

The Bank has established an independent competent organisational unit that is competent for handling complaints.

Article 8

The Bank shall submit information on complaints and resolving complaints to the Commission, and if prescribed to the Alternative Settlement of Disputes Entity.

Article 9

Within the competent organisational unit the Bank analyses complaints and information on resolving complaints so as to ensure they determine and resolve all risks, i.e. issues.

4. TRANSITIONAL AND FINAL PROVISIONS

Article 10

To all that is not regulated by this Rulebook on Handling Client Complaints shall apply the provisions of the Rules of Procedure and other internal acts of the Bank. The procedure under a clients' complaint and any other related issues are governed in detail by the Bank's internal act that applies to all not regulated hereunder.

Article 11

This Rulebook on Handling Client Complaints shall enter into force on the day of obtaining consent of the Securities Commission, and shall commence to apply eight days from the date of its publication on the bank's website.

THE BOARD OF DIRECTORS OTP BANKA SRBIJA
CHAIRMAN OF THE BOARD OF DIRECTORS,

LÁSZLÓ WOLF