

Complaints Rules

1. OPENING PROVISIONS

- 1.1 **Objective of the Complaints Rules.** The Complaints Rules of Patria Finance, a.s. (the “**Complaints Rules**” and “**Patria**”) provide for the procedure of receiving and handling client complaints and claims in connection with Patria’s clients and potential clients.
- 1.2 **Legal basis.** The Complaints Rules were issued on the basis of the applicable laws and regulations, primarily the requirements specified in Article 26 of Commission delegated Regulation (EU) 2017/565 of 25 April 2016 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.

2. FILING A COMPLAINT

- 2.1 **Contents and essentials of a complaint.** Each client may complain about any particular service provided to the client by addressing a complaint to Patria in which the client describes his or her disagreement with the manner in which a particular service was provided or the result thereof; the client must also specify the redress sought by the client. If the client seeks a material indemnification, the complaint must contain a reasoned calculation thereof.
- 2.2 **Providing information and documents.** The client should, in the client’s own interest, submit any documents supporting the client’s complaint. The complaint will be processed even if the documents are incomplete or entirely lacking (lost or otherwise unavailable) if the complaint clearly indicates what the client complains about. Patria is in each and every case obliged to archive certain documents and such documents will also be duly reflected during the investigation of the complaint.
- 2.3 **How to file a complaint.** Any client filing a complaint must send the written complaint by e-mail to patria@patria.cz, or send the written complaint by registered mail or deliver it personally to Patria’s registered office. A complaint may be filed by any client of Patria or the client’s authorized representative (the “**Complainant**”). If the client sends his or her complaint to a different mailing address of Patria, the employee who receives the complaint shall forward it to the Authorized Employee for processing but Patria shall not guarantee in such case that the deadlines for handling the complaint will be met.
- 2.4 **Deadline for filing a complaint.** The client is obliged to file the complaint without undue delay after the client was provided with the service that the client subsequently wishes to complain about. This is, indeed, one of the reasons why Patria recommends that each Client should check any statements provided by Patria to the Client.

3. RECEIPT AND MANAGEMENT OF COMPLAINTS

- 3.1 **Identification data of the Complainant.** Having received the complaint, Patria verifies, based on the established identification data (e.g. compliance of the sender’s e-mail address with the records in Patria’s database) and the subject matter of the complaint, whether the

Complainant is a person authorized to file the complaint. If the data in the written complaint are insufficient, the sender is asked to supply additional data or attend a personal meeting. Unless the Complainant's authorization to discuss the complaint is duly evidenced, Patria's employee postpones or refuses any discussion of the complaint. However, Patria's employee is obliged to inform the person filing the complaint accordingly, including any underlying reasons.

- 3.2 **Notice to a representative.** If the client requests that the result of any investigation regarding the complaint be communicated to the client's representative rather than the client themselves, the client is obliged to present Patria with a power of attorney authorizing the respective representative to receive the outcome of the complaint procedure. The client's signature on the power of attorney must be authenticated. The requirement of authentication shall be waived if the client's representative is an attorney (lawyer).
- 3.3 **Authorized Employee charged with the handling of the complaint.** After Patria receives the complaint, it shall be assigned to Patria's authorized employee from the Customer Care division (the "**Authorized Employee**") who is responsible for handling the complaint, with the mandatory assistance of any involved departments. The Authorized Employee is primarily obliged to adopt the following measures:
- a) Provenly confirm to the Complainant that the complaint was received and inform the Complainant of the subsequent process of handling the complaint;
 - b) Contact the head of Patria's department which, according to Patria's Organigram, provided the service that the client complains about (the "**Relevant Department**") and the Compliance Division;
 - c) Check whether the complaint is legitimate based on the documents presented by the Complainant and Patria's own available information and in cooperation with the Relevant Department;
 - d) If the resolution of the complaint requires any external expert assessment outside the Relevant Department, especially any legal assessment, the Authorized Employee requests the assistance of Patria's Legal Division and Compliance Department,
 - e) Process and gather documents relating to the complaint and, if necessary, provide the Documents to the Relevant Department or any other department of Patria engaged in the handling of the complaint;
 - f) Inform the Complainant in writing how the complaint was resolved (acknowledgment and settlement of the complaint or grounds for dismissal of the complaint).

4. RESOLUTION OF A COMPLAINT

- 4.1 **Legitimacy of a complaint.** Whether or not the complaint is legitimate shall be established after the complaint is examined according to the following articles of the Complaints Rules. A complaint is deemed legitimate if the particular service was not properly arranged for the Complainant due to a failure to observe any generally binding laws and regulations, contractual arrangements with the client, any relevant internal regulations of Patria or as a result of improper supply of any related services ordered by Patria from other institutions. Patria's assessment of damage and losses (if any) and the amount thereof shall be primarily based on the prices valid at the time when the defective performance was provided or immediately thereafter.

- 4.2 **Person competent to resolve the complaint.** The decision as to whether or not the complaint is legitimate and how the complaint shall be handled will be made by the head of the Relevant Department following a discussion with the Authorized Employee.
- 4.3 **Deadline for handling a complaint.** Any complaint should be handled within 30 days of the proper filing thereof. This time limit shall also include the time necessary for any expert assessment. This is the reason why all complaints must be handled without delay. If a complaint cannot be handled within 30 days of filing, the Complainant is informed by the Authorized Employee that the examination of the case is still pending. The Complainant is also informed of the approximate date when the complaint will be resolved and the grounds for the delay.
- 4.4 **Information on how the complaint was handled.** A written resolution of the complaint is dispatched to the client's e-mail address or to any e-mail or mailing address notified by the client to Patria.
- 4.5 **Subsequent hearing of the complaint.** If the Complainant disagrees with how the complaint was handled, the Complainant may repeatedly address Patria with a request for a repeated examination of the complaint; the Complainant must, however, support its notice to Patria with reasons, including specific material reasons why the Complainant disagrees with how the complaint was handled.
- 4.6 **Other alternatives open to the Complainant.** Regardless of the complaint procedure and the result thereof, the client may proceed as follows:
- a) If the client is a consumer, he or she may file a motion with the Czech Financial Arbitrator (www.finarbitr.cz),
 - b) File a civil lawsuit with a court,
 - c) File a complaint with the Czech National Bank.

5. CLOSING PROVISIONS

- 5.1 **Availability of the Rules.** The Complaints Rules are publicly accessible to the clients in Patria's registered office or at Patria's website. The Rules will be sent to clients on request.
- 5.2 **Register of complaints.** Any documents regarding the clients' complaints are registered in Patria's internal system.
- 5.3 **Forwarding information.** The Compliance Department informs the Czech National Bank of any complaints if requested to do so in the exercise of the latter's supervisory duties. The Compliance Department informs Burza cenných papírů Praha, a.s. (Prague Stock Exchange) in compliance with any valid and applicable stock exchange regulations.
- 5.4 **Amendments of the Complaints Rules.** Decisions to amend the Complaints Rules shall be adopted by Patria's Board of Directors.
- 5.5 **Effective date.** These Complaints Rules take effect on 10 June 2019 and replace the previous version of 29 September 2015.