

Complaints Handling Policy and Procedure

1. OPENING PROVISIONS

- 1.1 **Objective of the Complaints Handling Policy and Procedure.** The Complaints Handling Policy and Procedure of the company Patria Finance, a.s. (the “**Complaints Rules**” and “**Patria**”) provide for the procedure of the company Patria for receiving and handling complaints and claims of its clients and potential clients (the “**Client**”).
- 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 substantiated calculation thereof.
- 2.2 **Providing information and documents.** The Client should, in its 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.** The Client (or its authorized representative, if applicable) filing a complaint must send a written complaint by e-mail to instisales@patria.cz, or send a written complaint by registered mail or deliver it personally to Patria’s registered office. The complaint may be filed by any Client of Patria or the Client’s authorized representative. If the Client, or its authorized representative (if applicable), sends its 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 documents provided by Patria to the Client.

3. RECEIPT AND MANAGEMENT OF COMPLAINTS

- 3.1 **Identification data.** 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 Client, or its authorized representative (if applicable), 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 an in-person meeting. Unless the Client's, or its authorized representative's (if applicable), authorization to discuss the complaint is duly evidenced, Patria's employee shall postpone or refuse the in-person meeting in respect 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 (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) confirm to the Client (or its authorized representative, if applicable), in a verifiable manner, that the complaint was received and inform the Client (or its authorized representative, if applicable) 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 Client (or its authorized representative, if applicable) 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 Client (or its authorized representative, if applicable) 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 Client 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 Client (or its authorized representative, if applicable) is informed by the Authorized Employee that the examination of the case is still pending. The Client, or its authorized representative (if applicable), 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 e-mail address of the Client, or its authorized representative (if applicable), or to any e-mail or mailing address notified by the Client to Patria.
- 4.5 **Subsequent hearing of the complaint.** If the Client disagrees with how the complaint was handled, the Client may repeatedly address Patria with a request for a repeated examination of the complaint; the Client must, however, support its notice to Patria with reasons, including specific material reasons why the Client disagrees with how the complaint was handled.
- 4.6 **Other alternatives for proceeding.** Regardless of the complaint procedure and the result thereof, the client may proceed as follows:
 - a) File a lawsuit with a court,
 - b) File a complaint with the Czech National Bank.

5. CLOSING PROVISIONS

- 5.1 **Availability of the Complaints Rules.** The Complaints Rules are publicly accessible to the Clients at the Patria's registered office or at Patria's website. The Complaints Rules will be sent to the 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.
- 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 01 September 2026.