

Policy for Handling Complaints, Queries and Root Cause Analysis

Document purpose and scope

The Policy sets out the standards and describes how the Bank should deal with complaints. It also explains how the analysis of root causes of issues reported by customers contribute to the improvement of business processes.

Which ESG-related issues does the Policy address?

The Bank processes complaints according to the following principles:

- High service standards: Customers who contact the Bank for any query or to file a complaint are treated fairly and accurately.
- Accessibility: Information about the Bank's complain resolution process is available for customers. They can file complaints and queries via various channels. They are accessible (also for disabled people or customers with special needs).
- Fairness & objectivity: When making complaint-related decisions, the Bank acts fairly and objectively and considers each customer's individual circumstances. Responses to customer submissions should address all issues raised, include a clear rationale, and provide comprehensive information regarding the Bank's position and the available appeals process.
- Timeliness: The Bank responds without undue delay. Customers are provided with information about the maximum, statutory time limit for complaint resolution. On those occasions when it is not possible to respond to the customer within the estimated deadline, the customer is informed of the delay, the new deadline, and the reasons for the delay.
- Clear communication: Customers receive updates on the current status of their case, and all responses are easy to understand. When specialized terminology is required, it is accompanied by appropriate explanations.
- Employee skills: The resolvers (responsible for dealing with complaints, matters reported by customers) should possess the necessary skills and expertise to resolve issues thoroughly and reliably.

The Policy also describes how customer submissions are monitored to identify areas for improvement and implement corrective actions. Customer feedback (complaints, queries) is a valuable source of insight into product or process-related issues and should be used to drive enhancements. Analysing the root causes of submissions helps eliminate irregularities, improve the customer experience, and build trust and long-term relationships.

The highest management level responsible for the Policy

The Policy sets out the responsibilities of individual functions in the Bank:

- In specific cases, the Bank's Customer Care Officer should respond to customer appeals regarding complaint decisions.

- Business units managing products or processes should contribute to the achievement of the target concerning the number of customer complaints and, if required, implement corrective actions that should be monitored.
- The Bank's Management Board is presented with complaint reports (including reports on how corrective actions are addressed).

Application across the Bank's subsidiaries

The Policy applies at the Bank.