




PROCEDURE ON EXAMINATION OF COMPLAINTS OF INDIVIDUALS

UAB "I asset management"

Responsible Person	Director
Approved by	Decision of the Board No 07/12/2022
Effective date:	7 December 2022.
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Availability	Intranet of the Company Publicly accessible on the web site of the Company.



PROCEDURE ON EXAMINATION OF COMPLAINTS OF INDIVIDUALS

1. GENERAL PROVISIONS

- 1.1. This Procedure on Examination of Complaints of Individuals (the **Procedure**) of UAB "I asset management" regulates the process of management of complaints received by UAB "I asset management" (the **Management Company**) related to the services provided by the Management Company (acceptance, registration, examination of complaints, adoption of decisions on complaints, preparation of responses to them and other related processes).
- 1.2. This Procedure is prepared in accordance with the Rules for Examination of Complaints Received from the Finance Market Participants (with later amendments and (or) supplements) (the **Rules**), approved by the resolution No 03-105 of the Board of the Bank of Lithuania as of 6 June 2013.
- 1.3. This this Procedure must be followed by all employees of the Management Company.
- 1.4. Definitions used in the Procedure:

Responsible Employee	shall mean an employee of the Management Company responsible for the Complaint management process;
Employee	shall mean any employee of the Management Company;
Customer	shall mean a natural or legal person to whom the Management Company provides or intends to provide financial services related to investment in collective investment undertakings managed by the Management Company;
Claimant	shall mean the person who submitted the complaint regarding the services provided by the Management Company or (and) regarding the contracts concluded with the Management Company, i.e. an existing or potential Customer or his representative;
Complaint	shall mean a written application submitted to the Management Company stating that the rights or legitimate interests of a person related to the services provided by the Management Company or the contracts concluded have been violated, and requests to satisfy the requirements of the claimant;
Register of Complaints	shall mean the register or relevant computerized document registration system, in which the complaints of the Claimants received directly from the Claimants or through postal institutions, as well as by fax, e-mail or other electronic means are registered;
Rules	shall have the meaning referred to Clause 1.2 of the Procedure;
Procedure	shall mean this Procedure on Examination of Complaints of Individuals;
Management Company	shall have the meaning referred to Clause 1.1 of the Procedure;

2. SUBMISSION OF COMPLAINTS

- 2.1. The information about the process of examination of complaints is published on the web site of the Management Company by link: <http://www.1am.lt/>
- 2.2. At the request of the Claimant, information about the process of examination of Complaints and other information required by the Claimant related to the examination of Complaints is provided in writing.

- 2.3. The Claimant, believing that the Management Company improperly provided financial services or that the Management Company otherwise violated the rights or legitimate interests of the Claimant arising from contractual or related relationships, or for other valid reasons set forth in this Procedure, has the right to submit a Complaint directly to the Management Company or through the Employees or representatives during meetings with them.
- 2.4. Company data of the Management Company: Upės Str. 21-1, Vilnius, tel. +37061874816, e- mail: info@1am.lt.
- 2.5. If the Complaint is submitted by the representative of the Customer, a power of attorney or any other document confirming the authority of the representative must be submitted.
- 2.6. The Complaint must be submitted in writing. A Complaint can be submitted:
 - (a) upon personal arrival at the head office of the Management Company;
 - (b) through the employees or representatives of the Management Company during meetings with them;
 - (c) sent by registered mail to the registered office address of the Management Company;
 - (d) by e-mail (by attaching the Complaint as a separate attachment to ensure text protection and to identify the signature); or
 - (e) by other telecommunication means that provide an opportunity to prove the fact of providing information.
- 2.7. Complaints must be neatly and legibly written in Lithuanian or English. The Complaint must contain the given name, surname of the Claimant, date of submission of the Complaint, exact address of the Claimant, if it is desired to receive a response to the Complaint, contact phone number, other important contact information, signature of the Claimant.
- 2.8. The Complaint must clearly state the complained actions of the Management Company, its Employees and (or) representatives, as well as motivated, precise and clear requirements of the Claimant.
- 2.9. The Claimant, who submitted a Complaint that does not meet the requirements set forth in this Procedure, is informed in writing of what information is missing within 5 (five) calendar days. The response also indicates the deadline for eliminating the deficiencies. If the Claimant does not eliminate the deficiencies within the deadline, the Management Company has the right not to examine such Complaint.

3. REGISTRATION OF COMPLAINTS

- 3.1. All complaints received by the Management Company in the first instance shall be referred to the Director of the Management Company.
- 3.2. Received Complaints are forwarded by the Director of the Management Company to the Responsible Person who is responsible for registration of Complaints of the Customers in the Register of Complaints.
- 3.3. The Register of Complaints contains the following data identifying the Complaint:
 - (a) Registration number;
 - (b) Given name and surname or name of the Claimant;
 - (c) Address of the Claimant specified in the Complaint;
 - (d) Date and method of receiving the Complaint;
 - (e) The essence of the Complaint (brief content);
 - (f) The services of the Management Company which are complained of;
 - (g) Date of submission of the response to the Claimant;
 - (h) The final result of the Complaint examination (decision).
- 3.4. The Register of Complaints also contains all actions related to the Complaint examination, taken during the Complaint examination.

4. PROCEDURE ON EXAMINATION OF COMPLAINTS

- 4.1. The registered Complaint is examined by the Responsible Person, who is entitled to use other Employees for the examination of Complaints and have sufficient skills, knowledge and experience to deal with Complaints.
- 4.2. Upon receipt of a Complaint, the Director of the Management Company shall first assess whether a conflict of interest exists between the Complainant and the Responsible Person. In the event of a situation where a conflict of interest exists between the Responsible Person and the Complainant, the Director of the Management Company shall appoint another Employee with sufficient skills, knowledge and experience to handle the Complaint. If there are no Employees in the Management Company who are capable of dealing with the Complaint in a proper and impartial manner, the Director of the Management Company shall, by decision of the Director of the Management Company, delegate the handling of the Complaint to an impartial and competent third party.
- 4.3. In order to examine the Complaint in full, the Responsible Person shall, among other things:
 - (a) analyse and assess the historical data of service of the Claimant;
 - (b) analyse and assess previous Complaints of the Claimant (if any);
 - (c) assess other available information and documents relevant to the examination of the Complaint.
- 4.4. If the Responsible Person considers that additional information and (or) any other written evidence is necessary for the examination of the Complaint, he has the right to request such information from the Claimant.
- 4.5. Documents and information for the investigation of a complaint may be gathered from data held by the Management Company, from the Complainant and/or from reliable public sources. The Management Company may, if necessary, contact the competent authorities to obtain documents or information.
- 4.6. The Management Company examines the submitted Complaints within the shortest possible time, within the terms set in Part 5 of the Procedure. Complaints are examined in accordance with the general principles of reasonableness, good faith, justice, cost-effectiveness, in cooperation with the Claimant and making every effort to reach a solution as peaceful as possible.
- 4.7. Complaints are examined in writing. In exceptional cases, one may organise meetings of the parties in order to settle the dispute with the Claimant. Meetings can be organized upon the initiative of both the Claimant and the Management Company.

5. RESPONSE PROCEDURE

- 5.1. A Complaint must be examined and a reasoned response provided to the Claimant not later than within 30 calendar days from the date of receipt of the Complaint, except for those cases where the Complaint objectively cannot be examined within the 30 calendar day period. In such a case, the Responsible Person must notify the Claimant about this, specifying the circumstances of the delay in providing a response to the Complaint and the deadline by which the Complaint will be examined and the response provided to the Claimant.
- 5.2. The response to the Complaint must be clear and understandable.
- 5.3. The response to the Complaint is submitted in writing.
- 5.4. If the Claimant's complaint is not satisfied or is partially satisfied, the Management Company shall, in its response to the Complaint, state the reasons for refusing to satisfy the complaint and shall identify the possible remedies (negotiations between the Claimant and the Management Company, out-of-court dispute resolution, or, if an agreement cannot be reached by any of the aforementioned remedies, then the dispute may be litigated in the court).
- 5.5. The response is registered in the Register of Complaints. The original of the response together with the attached documents is submitted to the Claimant personally or sent by registered mail.
- 5.6. If the Management Company is not responsible for the performance of the activities specified in the Complaint of the Claimant, the Management Company shall respond in writing to the Claimant, indicating the reasons for refusing to accept and examine the Complaint, and also, if possible, indicating to the Claimant the financial market participant responsible for examining his Complaint. The response is provided in accordance with the procedure set out in Clauses 5.1 - 5.4 of the Procedure.

6. ASSESSMENT OF COMPLAINT EXAMINATION RESULTS

- 6.1. In order to identify the shortcomings of its operation and potential legal or operational risks, the Management Company continuously assesses the results of examination of Complaints. When assessing the results, the Management Company:
- (a) collects information about similar Complaints related to a specific service, analyses this information in order to determine the fundamental reason for the occurrence of Complaints, as well as sets priorities for eliminating the causes;
 - (b) assesses whether the fundamental reasons for the occurrence of specific Complaints may lead to the occurrence of Complaints referred to other services;
 - (c) assesses whether the fundamental causes of Complaints can be eliminated and determines the methods of their elimination;
 - (d) if necessary, eliminates the identified fundamental causes of Complaints;
 - (e) ensures that information on recurring or systematic causes of Complaints is regularly provided to the managers of the Management Company.
- 6.2. The managers of the Management Company shall evaluate the effectiveness of the Procedure at least once a year, taking into account the number of Complaints and the outcome of their handling. If a situation arises where Complaints become recurrent and systematic, the Management Company's management may decide to evaluate the effectiveness of the Procedure more frequently than once a year.
- 6.3. The Management Company must keep information on management decisions regarding the elimination of operational shortcomings identified on the basis of Complaints and risk management for at least 3 years.
- 6.4. The Management Company shall provide the Bank of Lithuania with the information on the received Complaints referred to financial instruments not later than within 2 months after the end of the calendar year in accordance with the requirements established by the Bank of Lithuania in the Rules.
- 6.5. The Management Company accumulates and at the request of the Bank of Lithuania provides information on the number of received Complaints, sorted by the reasons for submission and the results of the examination (Complaints received, Complaints examined, Complaints satisfied, Complaints partially satisfied).
- 6.6. The examined Complaints and materials related to the examination of Complaints are archived and stored in the Management Company for at least 3 years.

7. FINAL PROVISIONS

- 7.1. The Procedure, its amendments or supplements enter into force after they are approved by the Board of the Management Company.
- 7.2. The Procedure can be amended and (or) supplemented only by the decision of the Board of the Management Company.
- 7.3. The Head is responsible for proper implementation of this Procedure.
- 7.4. This Procedure shall be made available to all Employees of the Management Company and investment decision makers with whom civil service contracts are entered into, either on a durable medium or by means of a link to the database on which it is posted..