

CUSTOMER COMPLAINTS HANDLING POLICY

Effective as of November 28, 2024

A. SCOPE AND GENERAL PRINCIPLES

The present Customer Complaints Policy covers the handling of all customer complaints brought forward to DNB Luxembourg S.A (hereafter "the Bank"). In accordance with CSSF Regulation 16-07 relating to out-of-court complaint resolution, a complaint shall mean a "complaint filed with a professional to recognise a right or to redress a harm". For this reason, the Bank does not consider a simple request for information or clarification as a customer complaint. All customer complaints shall be processed by the Bank in line with CSSF Regulation 16-07 as well as Circular CSSF 17/671 that specifies the aforementioned.

B. STANDARD COMPLAINTS HANDLING PROCESS

The person responsible for the complaints handling at the level of the management of the Bank is the Managing Director, who has delegated the daily coordination and follow-up of customer complaints to the Legal Advisor while the Chief Compliance Officer (CCO) is responsible for registering every complaint and monitoring the operation of the complaints process.

Customers may file a complaint by sending it in writing to the attention of the CCO, by email to LuxembourgComplaints@dnb.no, or by post to DNB Luxembourg S.A., 13, rue Goethe, L-1637, Luxembourg.

The complaints shall include:

- The Customer's name and account number
- The identity and contact details of the Account Manager or of the department to whom the complaint should be directed
- A detailed description of the facts that caused the complaint
- Relevant evidence and information related to the complaint

When the Bank receives a Customer complaint, the following steps shall be followed:

- A written acknowledgement of receipt shall be sent to the Customer within a period which shall not exceed 10 business days after receipt of the complaint, unless the answer itself is provided to the complainant within this period. The Bank will allocate a person in charge of the complaint and the Customer will be advised of the name and contact information of that person in the acknowledgement of receipt.
- The Bank shall provide an answer to the Customer without unjustified delay and in any case within one month of receipt of the complaint. Where an answer cannot be provided within such timeframe, the Bank shall inform the Customer of the causes of the delay and indicate the date when the answer is likely to be provided. The answer shall be provided in a plain and easily comprehensible language.
- If the Customer doesn't obtain an answer, or when the answer is not considered satisfactory, the Customer has the right to escalate the complaint to the Managing Director of the Bank. Such request shall be made in writing and sent to the attention of Managing Director of the Bank at DNB Luxembourg S.A. at 13, rue

Goethe, L-1637. The Bank will reassess the case as relevant, and will then provide the Customer with a full explanation of its position.

- When the complaint handling at the level of the Managing Director does not result in a satisfactory answer for the Customer, the Customer may refer its complaint to the Luxembourg's financial services authority (CSSF), as outlined in point D below.

C. SPECIFIC PROCESS FOR COMPLAINTS RELATING TO PAYMENT SERVICES

For complaints relating to payment services, specifically those in relation the rights and duties arising under EU Directive 2015/2366 ('PSD2'), the general principles outlined above also apply. However the timeframe for answering to the Customer shall be adjusted as follows:

- The Bank shall make every effort to provide the Customer with a written answer by letter or by another durable medium within 15 business days from the date of receipt of the complaint.
- In exceptional situations, when the answer to a complaint cannot be provided within said timeframe, the Bank will send a written acknowledgment of receipt to the Customer indicating the reasons for the delay, the expected date of final reply and the name of the person handling the complaint. The Bank commits to always provide an answer without undue delay and in any case, within a period which will not exceed 35 business days after the date of receipt of the complaint.

The Customer, as payment user, can also submit a complaint directly to the CSSF, in case of suspicion that the Bank, as payment services provider, is not meeting certain of its legal requirements under the Law of November 10, 2009 on payment services. In order to facilitate the filing of such a request, the CSSF publishes a form on its website (<https://www.cssf.lu/en/2019/02/complaints-about-infringements-of-the-law-of-10-november-2009-on-payment-services/>). Further guidance and practical details about this process can be found on the CSSF website.

D. LODGING A COMPLAINT WITH CSSF FOR OUT OF COURT RESOLUTION

The Customer also has the possibility of recourse by opening a procedure to resolve the claim out-of-court with the CSSF, in accordance with CSSF regulation No 16-07 and related CSSF circular No 17/671 relating to the out-of-court complaint resolution procedure.

The opening of the procedure for an out-of-course resolution of complaints to the CSSF is notably subject to the following conditions:

- The dispute must concern a financial product or service;
- The complaint must not concern the business policy of the Bank;
- A complaint in writing has been previously sent at the level of the Managing Director of the Bank following the process detailed above; and
- The Customer has not received an answer or a satisfactory answer within one month from the date the complaint was sent to the Bank.

The Customer may file his/her request with the CSSF within one year after the complaint was sent to the Bank. The request must be filed with the CSSF in writing, by post or by fax to the CSSF or by email (to the address/number available on the CSSF website), or online on the CSSF website.

In order to facilitate the filing of a request, the CSSF publishes a dedicated form on its website <https://www.cssf.lu/en/customer-complaints/>. Further guidance and practical details about this process can be found on that website.

Following receipt and acknowledgement of a complaint that meets all the required conditions, the CSSF will contact the Bank to discuss the case, and as applicable request additional supporting documentation. The Bank commits to fully cooperate in the investigation process.

E. LODGING A COMPLAINT WITH THE OMBUDSMAN OFFICE – FOR SWISS RESIDENTS ONLY

A Customer that is a Swiss resident, and that have not received a response or have received an unsatisfactory response from the Bank in accordance with this Customer Complaints Handling Policy, has the possibility to initiate mediation proceedings in accordance with article 74 of the Swiss Financial Services Act (FinSA) before the Ombudsman Office to which the Bank is affiliated:

Ombudsstelle für Finanzdienstleister (OFD)

Bleicherweg 10
8002 Zürich
Switzerland
Tel office +41 44 562 05 25
ombudsmann@ofdl.ch
www.ofdl.ch

The Ombudsman is a neutral and impartial information and mediation body that will be inexpensive or free for the Customer. The mediation procedure will be governed by the Ombudsman Office's procedure rules in force at the time the request for mediation is submitted. These can be downloaded from the website www.ofdl.ch or requested from the ombudsman.

Unless otherwise agreed, the mediation will be conducted in the official language of the Swiss Confederation or English at the Customer's choice. The customer's intervention with the Ombudsman does not interrupt the course of the normal legal periods (statute of limitations, etc.). If an authority is already active (e.g. court, administration, debt collection office), the Ombudsman can usually no longer intervene.

The Ombudsman is not a state court. Rather, the Ombudsman promotes dialogue between the parties. Instead of a judgment, the Ombudsman mediates a negotiated solution to the parties to the dispute. This is not binding and the parties are free to decide whether to follow the Ombudsman's suggestion or take other, e.g. legal, action.

F. RECORD KEEPING

All communications and assessments in relation to the provisions of this Policy – including the measures taken to address the complaint - shall be recorded and retained by the Bank for a minimum period of ten years without prejudice to any other record-keeping obligations arising from other legislation than those listed in section A of this Policy.

For further details on DNB Luxembourg S.A.'s Customer Complaints Policy, please contact the Chief Compliance Officer of the Bank at: LuxembourgComplaints@dnb.no.

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