

**RULEBOOK ON COMPLAINTS
OF THE INVESTMENT COMPANY "FINVEO" JSC PODGORICA**

Finveo

The Capital Plaza, Cetinjska 11
81000 Podgorica, Montenegro

T +382 20 436 698

info@finveo.mn • www.finveo.com



Article 1

This Rulebook on Complaints of the Company (hereinafter: the Rulebook) regulates the manner of handling client Complaints and seeks to:

- simplify the procedure and process of filing Complaints,
- simplify the procedure and process of responding and monitoring received Complaints,
- use the information from the received Complaints to improve the business processes of the Company.

The actions provided for in this Rulebook relate to Complaints from clients and potential clients of the Company.

Article 2

The Complaint will be valid and considered only if it is submitted to the Company via the Complaint Form and if it is signed by the Complainant. Complaints are received in writing at the following addresses:

- 1) Investment Company "FINVEO" JSC Podgorica,
address: Cetinjska 11, Capital Plaza, 81000 Podgorica, Montenegro or
- 2) on the e-mail address: complaints@finveo.mn.

Immediately upon receipt of the Complaint, the Company will acknowledge receipt to the Complainant. If the received Complaint is incomplete, incomprehensible, or unclear, upon confirmation of receipt, the Company will request the amendment from the Complainant, on the submitted contact information.

If the Complainant does not submit the amendment for the submission of the Complaint as it is defined in this Rulebook and within three (3) working days from the date of the requested amendment, it shall be deemed that the Complainant has withdrawn the Complaint.

The Company shall endeavor to resolve the Complaint within seven (7) working days from the receipt of the Complaint, i.e., from the amendment of the Complaint, in accordance with the previous paragraph of this Article. If the Complaint cannot be resolved within the period defined, the Company shall notify the Complainant thereof (in the acknowledgment of receipt or in the subsequent notification) and shall also provide information on the approximate expected duration of resolving the Complaint.

Upon resolving the Complaint, the Company will notify the client of the final result without delay.

Article 3

All Complaints received are submitted to the Chief Executive Officer and Compliance Manager, who record them without delay. Complaints received by e-mail referred to in Article 2, paragraph 1, item 2 of this Rulebook, shall be forwarded simultaneously to the e-mail address of Chief Executive Officer, Compliance Manager and members of the Board of Directors.

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Upon registration of the Complaint, the Chief Executive Officer without delay informs the department whose scope according to the internal organization of business processes within the Company includes the action or omission that is the subject of the Complaint. The head of the department referred to in the previous paragraph of this Article or any other employee from that department is responsible for resolving the Complaint, which includes all communication with the Complainant as stated in the previous article of this Rulebook. Communication will be led along with Compliance Manager.

The person responsible for resolving the Complaint in accordance with the provision of the previous paragraph of this Article, is obliged to inform the Chief Executive Officer of the Company about any action taken and possible overdue deadlines.

When the person responsible for resolving the Complaint assesses that it is necessary to make and/or grant certain discounts to the client, he is obliged to obtain the prior written approval of the Chief Executive Officer of the Company (possibly electronically). In situations when it is assessed that the received Complaint could result in legal proceedings, the decision to contact external legal assistance is the responsibility of the Chief Executive Officer of the Company.

The person in charge of resolving the Complaint shall submit his/her views on the Complaint to the client or potential clients and shall report to the clients or potential clients on the options available to them, including resolving Complaints before the alternative dispute resolution entity under the law governing arbitration, by stock exchange arbitration or, ultimately, for the client to initiate litigation before the court of the state of Montenegro.

After resolving the Complaint (taking measures) and informing the Complainant, the person responsible for resolving the Complaint is obliged, without delay, to submit a report to the Chief Executive Officer and members of the Board of Directors on measures taken to resolve the Complaint, together with proof of notifying the Complainant (sent by registered mail or e-mail).

Upon receipt of the report referred to in the previous paragraph of this Article, the Person in charge of monitoring compliance in the Company shall archive the report in the Records in which the Complaint is kept, and will report on Compliant in the Compliance Report, i.e. inform the Board of Directors.

Article 4

The Chief Executive Officer of the Company is in charge of keeping the documentation on Complaints and measures taken on the basis of them, in the manner and within the deadlines provided by the General Rules of Business of the investment company "FINVEO" JSC.

Article 5

Records of Complaints are kept in such a way that Complaints and reports on measures taken are deposited in a separate registrar, in the form of a form, which is filled in and signed by the applicant and the person responsible for resolving the Complaint.

In addition to the above, it is possible to attach other relevant documentation.

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Article 6

The form for receiving Complaints can be found in the Annex, which forms an integral part of this Rulebook.

This Rulebook shall apply from the day of its adoption by the Board of Directors of the Company.

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PRAISE OR COMPLAINT FORM

Name: _____

Surname: _____

ADDRESS:

Street and house number: _____

Zip Code: _____

Place: _____

Country: _____

Contact phone: _____

E-mail: _____

Date and place of occurrence of the event: _____

Description of praise or Complaint:

In _____, date _____

Signature

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