

UAB "DOVRE FORVALTNING" COMPLAINT MANAGEMENT POLICY

I. COMMON PROVISIONS AND DEFINITIONS

1. This policy determines the requirements of UAB "Dovre Forvaltning" (hereinafter referred to as the Company) for the receipt, registration, processing and handling of complaints in relation to provided services and/or contracts concluded with customers, and for the conclusions on these complaints in accordance with the Rules on examination of complaints received by the participants of the financial market, approved in 2013 June 6 by the resolution of the Board of the Bank of Lithuania No. 03-105.
2. Company's managers are the CEO, deputy CEO and board members.
3. Customer is a natural person or legal entity to whom the Company provides financial services.
4. Applicant is a person, who submits the complaint in relation to provided services and/or contracts concluded with the Company, i.e. existing or potential client, beneficiary, injured third party, client of another financial market participant, potential client or his representative.
5. Complaint is a written statement of the applicant submitted to the Company, which includes the violations of the rights of a person or legitimate interests in relation to provided services or concluded contracts and the requests to fulfil the claims of the applicant.
6. Complaints registry (Annex 1) means a written or a computerized registration system, which registers complaints, received directly from the applicants or through the post offices in any branch or department of the Company, as well as it registers complaints, received by fax, e-mail or other electronic means.
7. Complaints management process - actions of employees of the Company related to receipt, registration, processing of complaint, informing the applicant, etc. The complaint management process is separated from other processes, for example claims handling (processing), requests for fulfilment of the terms of the contract, provision of information or clarification of certain conditions for the management (examination) of proceedings.
8. Foreign State means any country, which belongs or not belongs to the European Union and the European Economic Area, except the Republic of Lithuania.
9. When implementing the order of complaint handling, established in this Policy, Company shall follow the requirements of legal acts regulating personal data protection and the internal rules for the processing of personal data, approved by the Company.

II. REGISTRATION AND HANDLING THE COMPLAINTS

10. When handling complaints, employees of the Company shall comply with the principles of respect of human rights, justice, integrity, reasonableness, objectivity, impartiality and quick response.
11. The complaints, submitted by the applicants are received directly from the applicants at the office of the Company at Konstitucijos av. 7, LT-09308, Vilnius, Lithuania or by post at Konstitucijos av. 7, LT-09308, Vilnius, Lithuania, as well as by e-mail at info@dovreforvaltning.no or other electronic means. All complaints, submitted by applicants (including, but not limited to the complaints, submitted through the authorized third parties) are accepted.
12. The complaints of the applicants are examined and the answers are prepared by the Legal counsel of the Company. Applicants may ask questions in relation to the procedure of handling complaints by calling to the Company by phone: +370 526 83459.
13. The complaints of the applicants may be filed in the native Lithuanian language or in other foreign languages. Applicant must provide the following information in the complaint:
 - 13.1. applicant's name, surname or name of legal entity;
 - 13.2. applicant's address (where the applicant wishes to receive the response);
 - 13.3 essence of the complaint;
 - 13.4 description of the complained services or products and their types;
 - 13.5 clear, precise and motivated claims by the applicant;
 - 13.6. signature of the applicant's in case of natural person or the signature of the legal entity's head or authorized person and the company's stamp in case of legal entity.
14. The complaints of the applicants' are received and examined free of charge.
15. The complaints, received by the applicants are immediately registered in the complaint registry (Annex 1) indicating the following details of the complaint:
 - 15.1. applicant's name, surname or name of legal entity;
 - 15.2. address of the applicant, referred in the complaint;
 - 15.3. date and method of receipt of the complaint;
 - 15.4. essence of the complaint (short content);
 - 15.5 description of the complained services or products and their types;
 - 15.6. date of the response to the applicant;
 - 15.7. final outcome of the complaint's examination (decision).
16. Upon submission of inaccurate or incomplete information by the applicant, within 3 business days the Company sends the applicant a request for clarification of the required information. The Company also has the right to request documents, which confirm the circumstances, indicated in the applicant's complaint. In such a case, the

- time limit for the examination of a complaint starts to be calculated from the day the Company receives a revised complaint from the applicant.
17. In any case, upon receipt the applicant's complaint, the Company aims to resolve the dispute situation, problem by the peaceful means.
 18. Each complaint is handled by examining a particular and individual situation. During the examination of the complaint, the applicant is being contacted in order to find out in detail the circumstances of the (potential) dispute and in order to find the satisfactory solution for the applicant. The response to the applicant is formulated in a user friendly, clear and easy to understand language.
 19. The applicant's complaint will be examined and the response will be submitted as soon as possible, but not later than within 30 calendar days from the receipt of the complaint. In exceptional cases, when a complaint cannot be examined within the time period, specified in this clause, the authorized person of the Company shall inform the applicant about this, indicating the circumstances of the delay in submitting the response, and the date when the complaint will be examined and the response provided to the applicant.
 20. The decision of the complaint is registered in the complaint registry and sent by registered mail to the applicant at the address, indicated in the complaint. In cases where the complaint is submitted by e-mail, the response to the applicant is sent by e-mail. In accordance with the clauses of this policy, information provided by the email, fax, as well as other telecommunication facilities that provide proof of the fact that the information is/was provided, complies with the requirement to provide written information.
 21. After resolving a specific complaint, the applicant is contacted and asked whether he/she is satisfied with the fulfilment of the claims and is inquired about possible proposals about the Company's activities' improvement in order to avoid situations of potential complaints in the future.
 22. The complaints, received by the applicants, the data in relation to their examination, the document, which refers to the decision of the examination of the complaint and the provided response to the applicant shall be storage for at least 3 years from the date of the submission of the final response to the applicant.
 23. Personal data, provided by the applicant and other information is used in compliance with legal requirements.
 24. The applicant, who received an unsatisfactory response, has the right to apply to the Bank of Lithuania, at Žirmūnų g. 151, LT-09128, Vilnius, Lithuania, www.lb.lt, which is the competent institution to settle disputes between consumers and participants of financial market arising from the provision of the financial services.
 25. The applicant also has the right to defend his allegedly infringed interests by applying to a court in accordance with the provisions, specified in the laws of the Republic of Lithuania.

III. THE EVALUATION OF RESULTS OF THE EXAMINATION OF COMPLAINTS

26. In order to determine the drawbacks and potential legal or operational risks, the Company shall constantly evaluate the results of the examination of complaints. During this assessment, the Company shall:
- 26.1. collect information on similar complaints related to a particular service or product, to perform an analysis of this information in order to determine the causes of the complaint, and to identify the priorities of the removal of the causes;
 - 26.2. assess, whether the essential cause of the occurrence of certain complaints may lead to the appearance of complaints about other services or products;
 - 26.3. assess, whether the causes of the complaints may be eliminated and identify the elimination methods;
 - 26.4. if necessary, remove the identified causes of complaints;
 - 26.5. ensure that information regarding the recurring or systematic causes of complaints is regularly submitted to the Company's management in order the management could effectively perform the functions.
27. The information, collected under the clause 26 is used not only for the examination of claims, but also for the control of the quality of handling the complaints and for the prevention of potential complaints.
28. The Company shall storage the information about the decisions of management regarding complaint-based remedial actions and risk management at least 3 years.

IV. CONTROL

29. The Company's managers are responsible for the implementation and control of this policy.
30. The Compliance officer shall execute the observation of execution of this policy.

V. FINAL PROVISIONS

31. The Company in accordance with the legislative provisions shall collect and store the information about the complaints, including separated data about the reasons of the complaints and the results of the examination.
32. The Company in accordance with the requirements of legislative provisions shall submit to the Bank of Lithuania all information related to the received complaints, their examination and the results of the examination.
33. This policy enters into force upon its approval at the Board meeting and is valid for an indefinite period.
34. The Company shall periodically review and update this policy.
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COMPLAINT REGISTRY

NO.	Applicant (Name, surname/ Name of legal entity)	The address of applicant	Date of receipt the complaint	Method of receipt the complaint	The essence of the complaint	Description of the complained services or products, their types	Date of the response to the applicant	Final outcome of the complaint's examination (decision).	Remarks
1.									
2.									
3.									
4.									
...									