

Effective from: 15<sup>th</sup> October 2020

## Public Rules of Complaint Management

UniCredit Bank Hungary Zrt.'s main objective is to provide excellent services to its customers. However, despite our best intentions, our services may give rise to complaints or comments. In such cases, it is most important that you let us know about the problem so we may take steps to investigate and resolve it. Please find our Complaint Management Rules explained below.

### Rules of complaint management for natural persons

“Client” shall mean any natural persons, legal entities or other organizations to whom the Bank provides financial services, supplementary financial services, investment services or supplementary services; the Account Holder is also included in this term.

Natural persons (and their proxyholders) shall be deemed as clients even if they enter into a relationship with the Bank without signing a contract for financial, supplementary financial, investment and supplementary services with the Bank.

### Ways to make a complaint

Clients may lodge complaints verbally (in person or by phone) or in writing:

- at any of our branches (The list of our branches and their opening hours are available in the ATMs and Branches Locator on our website at [www.unicreditbank.hu](http://www.unicreditbank.hu).)
- by phone 24 hours a day, by calling our Telefonbank at +36 (1/20/30/70) 325-3200,
- by writing to us at the Bank's head office address (1054 Budapest, Szabadság tér 5-6.),
- by emailing us at [panasz@unicreditgroup.hu](mailto:panasz@unicreditgroup.hu),
- on the Bank's website: [www.unicreditbank.hu](http://www.unicreditbank.hu)
- by sending us a fax at +36-1-374-7838.

Clients may act through a proxy; the proxy (including the legal representative acting on behalf of the Client) must enclose the proxy form given by the Client. Our proxy form is available on our website at [www.unicreditbank.hu](http://www.unicreditbank.hu), under the menu “Complaint handling” in the bottom section of the homepage, and also at all our branches. Should the Client use a form other than that provided by the Bank, the proxy form shall comply with the requirements of Act CXXX of 2016 on the Code of Civil Procedure and include an authorization to disclose confidential banking information, specifying the exact scope of confidential banking information that may be disclosed.

A written complaint may be filed using the Consumer Complaint Form provided by the National Bank of Hungary, which is available on the Bank's website under the menu “Complaint handling” or in hard copy at the branches.

Effective from: 15<sup>th</sup> October 2020

### Investigating a complaint

The Bank does not charge any fees for investigating a complaint.

The Bank investigates verbal complaints made in person immediately and takes prompt remedial action to the extent possible. If the Client does not agree with such on-the-spot action or if such action is not possible, the Bank shall draw up a record of the complaint, which is to include the data identifying the complaint, thus at least the following:

- (a) the client's name;
- (b) the client's residential address, company seat and, if necessary, correspondence address;
- (c) the place, date and manner the complaint was presented;
- (d) a detailed description of the client's complaint, stating separately each objection contained in the complaint so that all such objections are investigated in full;
- (e) the number of the contract to which the complaint relates, and client number if applicable;
- (f) a list of the documents, papers and other evidence presented by the client;
- (g) if an immediate investigation of the complaint is not possible: the signature of the person drafting the report and that of the client (except if the verbal complaint was made by phone);
- (h) the place and date of drafting the report,
- (i) the name and address of the service provider subject to the complaint.

The Bank provides the Client with a copy of the record of the complaint. Pursuant to this record, the Bank shall further proceed in accordance with the rules on written complaints as stated in these Rules. If a complaint is received at the phone number provided for lodging complaints, the Bank shall act as generally expected in the given situation in order to provide a live voice reply within five minutes from the successful telephone connection initiated by the Client. An audio recording shall be taken of such complaints and any related communication between the Client and the Bank, and the Bank shall inform the Client about this at the beginning of the call. The Bank shall keep voice recordings for five years from the date of the recording, and within this timeframe the Bank shall give the Client access to listen to the audio recording and, furthermore, it shall provide, upon the Client's request, an authenticated transcript of the audio recording or the copy of the recording within 25 days, free of charge.

With respect to complaints lodged by phone, where immediate investigation is not possible or the Client disagrees with the Bank's handling of the complaint, the Bank shall communicate the data identifying the complaint to the Client and record the complaint, with the above detailed content; it shall send a copy of such record to the Client together with the Bank's response to the complaint.

The Bank shall forthwith investigate the Client's complaint with due regard to all the circumstances, and it shall send the Client the outcome of its exhaustive investigation of the complaint, the Bank's position on the complaint, along with a justification for the same, and a description of the measures taken, doing so within 30 days of the complaint being lodged or within 15 working days in the case of written complaints pertaining to its payment services. If any component of a complaint regarding the Bank's payment services cannot be answered within 15 working days for reasons beyond its competence, the Bank shall send the Client a provisional answer, which shall also state the reasons for the delay of the substantive response and the deadline for the final response. Nevertheless, the deadline for sending the final response shall never be later than the 35<sup>th</sup> working day from communicating the complaint.

Effective from: 15<sup>th</sup> October 2020

Response letters shall be sent to the address specified by the Client or, if a natural person client expressly requests so, they may be sent through the Bank's Internet Banking service or Mobile application. In handling complaints, the Bank shall act, to the extent possible under the circumstances, so as to avoid the emergence of a financial consumer dispute. If the Client disagrees with the outcome of the Bank's investigation of their complaint or does not receive a response to their complaint within the 30-day deadline or, in the case of complaints about payment services, within the 15- and/or 35-working day deadlines, the Client shall have the right to resort to other forums for judicial remedy. Clients may submit their claim for judicial remedy to the following bodies, depending on the subject of the claim and the competences of these organizations:

- the Financial Consumer Protection Center of the National Bank of Hungary (address: 1013 Budapest, Krisztina krt. 39. (Krisztina Plaza), correspondence address: 1534 Budapest BKKP Pf. 777, at any unit of the Government Windows network; online via the Ügyfélkapu website), requesting a consumer protection proceeding to investigate the breach of the consumer protection provisions of Act CXXXIX of 2013 on the National Bank of Hungary;
- the Financial Arbitration Board (address: 1013 Budapest, Krisztina krt. 39., correspondence address: 1525 Budapest BKKP Pf. 172; phone: +36-80- 203-776; e-mail address: [ugyfelszolgalat@mb.hu](mailto:ugyfelszolgalat@mb.hu))
- or may, in accordance with the rules stipulated in the Code of Civil Procedure, go to court if the complaint relates to the conclusion, validity, legal consequences and termination of the contract, or to a breach of contract and its legal consequences.

In its reply, the Bank shall inform the Client about what it believes the complaint focused on and, accordingly, to which official bodies and authorities the Client may escalate specific parts of the complaint. In its negative replies, the Bank shall include the correspondence address and phone number of the Financial Arbitration Board and its general declaration of subjection\*, the correspondence address and phone number of the National Bank of Hungary, and information on how to access, electronically or at the customer service, the forms used for requesting a proceeding by the Financial Arbitration Board or a consumer protection proceeding by the National Bank of Hungary (financial consumer protection form); it shall also clearly state that clients may request the Bank to send these forms to them free of charge. Information shall be provided on what phone numbers, e-mail addresses and postal addresses the client may use to send the forms. If the Bank receives this kind of special request, it shall send, without delay, the forms to the Client, either electronically, if the Bank has information on record evidencing that the Client has e-mail access, otherwise by post, free of charge.

If the Bank does not react to the consumer's complaint within the required deadline, rejects the complaint, or based on the reply of the Bank the consumer assumes other circumstances violating consumer rights under the Act on the National Bank of Hungary, he/she may initiate a consumer protection audit at the Magyar Nemzeti Bank.

To settle any disputes relating to the establishment, validity, legal effects and termination of the contract or breaches of contract, and their legal effect out of court, the consumer may request a procedure from the Financial Arbitration Board (FAB), provided that he/she has previously attempted to settle the dispute directly with the Bank, or has unsuccessfully submitted to the Bank an application for equitable treatment and no other procedure is pending in that specific case.

Effective from: 15<sup>th</sup> October 2020

The FAB shall first attempt to have the parties reach an agreement regarding the dispute; if such attempts are unsuccessful, it shall adopt a decision regarding the issue, which may either be a binding resolution if the Bank has accepted the FAB decision as binding on itself (submission), or it is otherwise permitted by law (see above), or in absence of the above, it may be a recommendation.

The FAB procedure is free of charge, but the parties themselves shall pay any expenses (if any).

Decisions made by the FAB do not affect the consumers' right to refer to a court. The law provides for remedies against the recommendations and binding resolutions of the FAB.

\* The Bank informs Clients that it shall submit to the procedure of the Financial Arbitration Board and, if settlement is not reached, to its decision adopted in the procedure, provided that the value of the transaction contested does not exceed HUF 3 million and the amount claimed by the Client does not exceed HUF 1 million.

Moreover, the Bank advises the Client that, in the absence of an arrangement, the Financial Arbitration Board may pass a binding resolution even without a statement of objection if the application is well grounded and the claim that the Client intends to enforce does not exceed HUF 1 million either in the application or when the binding resolution is made.

#### Rules of complaint management for non-natural persons

“Client” shall mean any natural persons, legal entities or other organizations to whom the Bank provides financial services, supplementary financial services, investment services or supplementary services; the Account Holder is also included in this term. Legal entities, unincorporated entities, other organizations and official agencies (and their proxyholders) shall be deemed as Clients even if they enter into a relationship with the Bank without signing a contract for financial, supplementary financial, investment and supplementary services with the Bank. Ways to make a complaint Clients may file complaints in person, verbally or in writing:

- in person, verbally or in writing, at any of our branches (The list of our branches and their opening times are available in the ATMs and Branches Locator on our website [www.unicreditbank.hu](http://www.unicreditbank.hu)).
- by writing to us at the Bank's head office address (1054 Budapest, Szabadság tér 5-6.),
- by emailing us at [panasz@unicreditgroup.hu](mailto:panasz@unicreditgroup.hu),
- by phoning Telefonbank at +36 (1/20/30/70) 325-3200, 24 hours a day
- on the Bank's website: [www.unicreditbank.hu](http://www.unicreditbank.hu)
- by sending us a fax at +36-1-374-7838.

Representatives and legal representatives acting for the Client must enclose the proxy form given by the Client. Our proxy form is available on our website at [www.unicreditbank.hu](http://www.unicreditbank.hu), under the menu item “Complaint handling” in the bottom section of the homepage, and also at all our branches. Should the Client use a form other than that provided by the Bank, the proxy form shall comply with the requirements of Act CXXX of 2016 on the Code of Civil Procedure and include an authorization to disclose confidential banking information, specifying the exact scope of confidential banking information that may be disclosed. Investigating a complaint

The Bank does not charge any fees for investigating a complaint.

Effective from: 15<sup>th</sup> October 2020

The Bank investigates verbal complaints made in person immediately and takes prompt remedial action to the extent possible. If the Client does not agree with such on-the-spot action or if such action is not possible, the Bank shall draw up a record of the complaint, which is to include the data identifying the complaint, thus at least the following:

- (a) the client's name;
- (b) the client's residential address, company seat and, if necessary, correspondence address;
- (c) the place, date and manner the complaint was presented;
- (d) a detailed description of the client's complaint, stating separately each objection contained in the complaint so that all such objections are investigated in full;
- (e) the number of the contract to which the complaint relates, and client number if applicable;
- (f) a list of the documents, papers and other evidence presented by the client;
- (g) if an immediate investigation of the complaint is not possible: the signature of the person drafting the report and that of the client;
- (h) the place and date of drafting the report.

The Bank provides the Client with a copy of the record of the complaint. Pursuant to this record, the Bank shall further proceed in accordance with the rules on written complaints as stated in these Rules. An audio recording shall be taken of complaints received at the phone number dedicated to complaint handling along with all related communication between the Client and the Bank, and the Bank shall inform the Client about this at the beginning of the call.

The Bank shall keep voice recordings for five years from the date of the recording, and within this timeframe the Bank shall give the Client access to listen to the audio recording and, furthermore, it shall provide, upon the Client's request, an authenticated transcript of the audio recording or the copy of the recording within 25 days, free of charge.

With respect to complaints lodged by phone, where immediate investigation is not possible or the Client disagrees with the Bank's handling of the complaint, the Bank shall record the complaint; it shall send a copy of such record to the Client together with the Bank's response to the complaint.

Representatives and legal representatives acting for the Client must enclose the proxy form given by the Client.

The Bank shall forthwith investigate the Client's complaint with due regard to all the circumstances, and it shall send the Client the outcome of its exhaustive investigation of the complaint, the Bank's position and actions regarding the complaint, along with a justification for the same, and a description of the measures taken, doing so within 30 days of the complaint being lodged, or within 15 working days in the case of written complaints pertaining to its payment services. If any component of a complaint regarding the Bank's payment services cannot be answered within 15 working days for reasons beyond its competence, the Bank shall send the Client a provisional answer, which shall also state the reasons for the delay of the substantive response and the deadline for the final response. Nevertheless, the deadline for sending the final response shall never be later than the 35<sup>th</sup> working day from communicating the complaint.

Response letters shall be sent to the address on record in the Bank's systems or specified by the Client or, if a small business client expressly requests so, they may be sent through the Bank's Internet Banking service. If the Client disagrees with the outcome of the investigation of their complaint, they may go to court in accordance with the rules in the Code of Civil Procedure.

Effective from: 15<sup>th</sup> October 2020

#### The complaint investigation process

The Bank shall investigate the Client's complaint and notify the Client in writing, within 30 days, of the outcome of the investigation, except in the case of complaints regarding payment services, when it shall send its written response to the Client within 15 days. If any component of a complaint regarding the Bank's payment services cannot be answered within 15 working days for reasons beyond its competence, the Bank shall send the Client a provisional answer, which shall also state the reasons for the delay of the substantive response and the deadline for the final response. Nevertheless, the deadline for sending the final response shall never be later than the 35<sup>th</sup> working day from communicating the complaint.

Should you wish to contact our colleagues during the investigation of your complaint, please call our Complaints Handling Department at +36-1-325-3205 or our Telefonbank at +36 (1/20/30/70) 325-3200. If you are not satisfied with our response, please tell us at any of the contact points mentioned above; our aim is to arrive at a mutually satisfying solution.

In the course of complaint management, the Bank may request the Client to provide the following information in particular:

- (a) name;
- (b) contract number, client number;
- (c) address, registered office, correspondence address;
- (d) phone number;
- (e) means of notification;
- (f) product or service related to the complaint;
- (g) complaint description, reasons;
- (h) the complainant's demands;
- (i) copies of the documents supporting the complaint that are in the Client's possession but are not available to the Bank;
- (j) a valid proxy for proxies acting on behalf of the Client;
- (k) any other information that may be necessary in order to investigate and respond to the complaint.

The Bank shall manage the data of the Client submitting the complaint in accordance with Annex 2 to its General Terms and Conditions.

#### Recording the complaints

The Bank shall keep a register of client complaints and the actions taken to settle and resolve them.

This register shall contain:

- (a) a description of the complaint, the event or fact complained about,
- (b) the date the complaint was submitted,
- (c) a description of measures taken to settle or resolve the complaint; if rejected, the cause of rejection, (d) the deadline for the measures to be taken, the name of the person responsible for its execution,
- (e) the date of the response to the complaint.

The Bank shall keep the complaint and the response thereto for five years and present them upon the request of the National Bank of Hungary.

In addition to the contact points mentioned above, you may also complain to the managers of Complaint Handling by contacting them here:

Judit Kóbor First Vice President: [judit.kobor@unicreditgroup.hu](mailto:judit.kobor@unicreditgroup.hu)

Rita Borbély Vice President: [rita.borbely@unicreditgroup.hu](mailto:rita.borbely@unicreditgroup.hu)