### HANDLING COMPLAINTS POLICY

### **December 15, 2023**

## I. INTRODUCTION

The purpose of this Policy on handling complaints ("PHC") is to ensure that "Power Gold ENP" UAB (the "Company") has in place a proper procedure for dealing with customer complaints across the Company and its affiliates.

Furthermore, this PHC allows the customers to file complaints stemming from their dissatisfaction with the Company services or its employees activity or actions, on the one hand, and establishes the guidelines and procedures for an efficient and consistent management of such complaints.

The Company considers the customer complaints important for its business architecture for the following main reasons:

- enables it to identify the areas of activity where actions are required to improve the services and/or products and enhance customer satisfaction;
- offers insights on the employees conduct and performance;
- triggers constant improvement meant to protect the Company and its employees imagine and reputation.

The Company recommends its employees to comply with this PHC, otherwise disciplinary sanctions, in accordance with the applicable laws, may be taken against those failing to do so.

### II. DUTIES

The Company Board of Directors has the duty to set up an efficient framework meant to allow the employees to manage the complaints effectively, diligently and in a timely manner. In this respect, the Board of Directors will ensure appropriate personnel and continuous training of the same so that the latter may be able to manage the customer complaints in accordance with the guidelines set forth under this PHC.

The Board of Directors will also ensure that the findings of any investigation minutes or reports are timely implemented, while matters falling within the scope of other law enforcement agencies are properly reported to the same.

The Company's employees have the responsibilities to manage the customer complaints in accordance with this PHC and keep updated and accurate records of such complaints in the Company's Complaints Register.

## III. CUSTOMER COMPLAINT GUIDELINES

## 1. The customer complaint stage

Whenever a customer complaints in person, on the phone or via electronic means of communication and interaction — e-mail, e-meeting platforms, social media, etc., - it is very important to let the customer explain the facts while you are paying attention to what it is complaining about.

It is equally important that you focus on the customer matter at hand and take notes of the facts to be able to further prepare the appropriate brief for the person who will deal with the underlying complaint.

The following behavioral actions must be taken by you when dealing with a customer filling a complaint:

- do not interrupt it, be patient and always remember that the complaint is not about you personally;
- remain calm, focused, positive, composed, avoid contradictory discussions and be helpful;
- be supportive, adopt a moderate and calm tone of voice and show empathy to the customer;
- do not treat the customer complaint lightly nor attempt to joke about it;
- be polite, thank to the customer for bring the matter up and share its concern while letting it know how important is for the Company to solve the complaint;
- do not be afraid to apologize if necessary;
- in case of an angry client keep your composure, do not engage it and control the dialogue with a constantly clam voice;
- if possible, try to address questions meant to clarify the facts and help the management process of the complaint;
- once the customer explanation is completed it is important that you summarise the facts and let the customer to confirm it or correct or supplement it; then, you should inform the customer on the actions you may take, in line with your job responsibilities and powers, such us steps that will be taken, timing for dealing with he complaint, persons

that will manage the same, potential remedial provisory actions, etc.; from this perspective, it is important that you always act within the boundaries of your authority, properly escalate the complaint and do not create or induce unrealistic expectations to the customer; whenever you deem appropriate you may ask advice or guidance from the senior management;

before you end the session with the customer make sure that it is comfortable with the
outcome and the overall management of its situation and that proper contact details
have been disclosed by the customer for feedback purposes.

# 2. The registration and assessment of the complaint stage. Customer feedback

Once the abovementioned stage is completed, the customer complain should be registered in the Company's Complaints Register as follows:

- complaint registration takes places immediately after completion of stage outlined at Section III.1., above;
- the complaint will not be assessed if it is meritless, trivial or vexatious; in this case, you should inform the customer accordingly in maximum 2 (two) working days as of the date when the complaint was made;
- if the complaint is neither vexatious or trivial nor meritless, then you should assess it and send your assessment along with the proposed resolution for confirmation to the senior management; you should perform the assessment promptly and in an objective manner bearing always in mind that there is nothing personal and the customer dissatisfaction must be professionally addressed; in this respect, you should take into account the market best practice, applicable legislation and case law, as well as to consider potential compromise solutions;
- do not hesitate to contact the customer if supplementary information or clarifications are necessary;
- follow up the confirmation process with the senior management to ensure that the customer receives feedback in maximum 15 (fifteen) days as of the date when the complaint was made;
- make sure that the feedback covers all the aspects which were discussed with the customer and mention in the Company's Complaints Register the measures taken as well as the fact that the underlying complaint has been resolved;
- the person who dealt with the resolution of the customer's complaint, based on the conclusions drawn from the respective case, may, to the extent he/she deems necessary, make proposals to the Company's management aimed at improving the Company's

processes and policies as well as their implementation to avoid similar complaints in the future.

# IV. CONTACT

Customers who wish to file a complaint are invited to send an e-mail to contact@powergold.tech