



CUSTOMER COMPLAINTS POLICY

DNB LUXEMBOURG S.A.

General principles

The present Customer Complaints Policy covers the handling of all customer complaints in DNB Luxembourg S.A. The customer complaint shall be understood as a customer (hereafter the "Customer") who presents a specific complaint about the activity performed by DNB Luxembourg S.A. (hereafter the "Bank").

Customer complaints

All customer complaints shall be processed in a secure manner within the Bank and in line with CSSF Regulation No 16-07 relating to out-of-court complaints resolution and CSSF Circular 17/671 relating to specifications regarding CSSF Regulation 16-07.

The Customers can file a complaint by sending such complaint in writing to the attention of the Legal Department of DNB Luxembourg S.A., on complaints@dnbgroup.lu or DNB Luxembourg S.A. office at 13, rue Goethe, L-1637, Luxembourg.

General Process for Complaints

When a Customer complaint is received, DNB Luxembourg S.A. will send a written acknowledgement of receipt together with the name and contact information of the person in charge of resolving the complaint issue to Customer within a period which shall not exceed 10 (ten) business days after receipt of the complaint, unless the answer itself is provided within this period.

DNB Luxembourg S.A. commits to do its best to ensure that the person in charge of resolving the complaint remains the same during the complaint process.

The Bank commits to always provide an answer without undue delay and in any case within 1 (one) month from the date of receipt of the complaint. Where an answer cannot be provided within this period, DNB Luxembourg S.A. will inform the Customer of the causes of the delay and indicate the date at which its examination is likely to be achieved.

In case the Customer is not satisfied with the answer the Customer has the right to raise the complaint up to the level of the Managing Director of the Bank in writing to the attention of the Managing Director of DNB Luxembourg S.A. at 13, rue Goethe, L-1637 Luxembourg.

If following such deliberations held with the Managing Director the Customer still considers the answer provided not sufficient and satisfactory, then the Bank must provide Customer with a full explanation of its position and inform him/her, in writing that, he/she has the possibility of recourse by opening a procedure to resolve the claim out-of-court with the CSSF in accordance with the CSSF Regulation 16-07.



Specific Process for Complaint Relating to Payment Services

When a Customer complaint relates to payment services, specifically the rights and duties arising under PSD 2, the Bank is committed to make every effort to provide the Customer with a written answer by letter or by another durable medium within 15 (fifteen) business days from the date of receipt.

In exceptional situations, when the answer to a complaint relating to payment services cannot be provided within said timeframe, the Bank sends 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 looking after the complaint.

The Bank commits to always provide an answer without undue delay and in any case, within a period which cannot exceed 35 (thirty-five) business days between the date of receipt of the complaint and the date at which the answer to the Customer was sent.

Complaint to CSSF

Customers can file a request with the CSSF within 1 (one) year after submitting the complaint to DNB Luxembourg S.A.

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

- A complaint in writing has been previously sent to the Chief Compliance Officer of the Bank; and
- The Customer has not received a satisfactory answer from the Chief Compliance Officer within one (1) month from the date the complaint was sent.

Complainants can refer their complaint to the CSSF either in French, English, German or Luxembourgish:

- By post at the following address:
CSSF Consumer Protection
283, route d'Arlon
L-2991 Luxembourg
Grand-Duchy of Luxembourg;
- By fax at the following number:
(+352) 26 25 1 – 601;
- By email at the following email address:
reclamation@cssf.lu; or
- By filling the CSSF form via the CSSF website:
http://www.cssf.lu/fileadmin/files/Formulaires/Reclamation_240615_EN.pdf

Requests to CSSF shall not be admissible in the following cases:

- 1) the complaint has been previously or is currently being examined by another alternative dispute resolution body, arbitrator, arbitration tribunal or a court, in Luxembourg or abroad;
- 2) the complaint concerns the business policy of DNB Luxembourg S.A.;
- 3) the complaint concerns a non-financial product or service;
- 4) the request is unreasonable, frivolous or vexatious;



- 5) the complaint has not been previously submitted to DNB Luxembourg S.A.;
- 6) Customer has not filed a request with the CSSF within one year after submitting the complaint with DNB Luxembourg S.A.;
- 7) the request handling would seriously impair the efficient functioning of the CSSF.

The link below gives the full text of the CSSF Regulation 16-07 relating to the out-of-court resolution of complaints:

http://www.cssf.lu/fileadmin/files/Lois_reglements/Legislation/RG_CSSF/RCSSF_No16-07eng.pdf

Following receipt and acknowledgement of the complaint, the CSSF will contact DNB Luxembourg S.A. to discuss the case and request additional supporting documentation. DNB Luxembourg S.A. commits to fully cooperate in the investigation process.

For further details on DNB Luxembourg S.A. Customer Complaints Policy, please contact the Chief Compliance Officer of DNB Luxembourg S.A. or the Legal Department on complaints@dnbgroup.lu.