

Arbolus Service Provider Limited Liability

Company

Complaints Handling Policy

1. Purpose of the policy

The purpose of the regulation of complaint handling is the lawful handling of complaints and requests arising in the course of the activities and work of the liquidating organisations subject to Act XLIX of 1991 on bankruptcy and liquidation proceedings, and to increase the legal and professional security of all participants in the special activities carried out by the organisations.

This draft regulates the reception, investigation and resolution of notifications, complaints and proposals from clients. This Code also aims to establish a uniform set of tasks, competences and procedures for the handling of complaints within the winding-up body and the review bodies.

2. Scope of the Rules

The scope of the Rules covers the members of the winding-up body, all its employees and those acting for the company under ad hoc and permanent civil law contracts, as well as the handling, processing and response of complaints by the Client within the company.

The Complaints Policy is in line with Act XLIX of 1991 on bankruptcy and liquidation proceedings, Act V of 2006 on the company register, court proceedings and the

and winding-up, Government Decree No 114/2006 on the Register of Liquidators, as well as the Articles of Association, the Rules of Organisation and Operation and the Code of Ethics of the National Association of Liquidators and Administrators.

3. Interpretative provisions

- Complaint: any individual right or claim, made in person orally or in writing, by one or more clients against an individual or general act or conduct of a liquidator, its departments or employees, or of a person acting for the company under a civil law contract, whether ad hoc or permanent.
- It does not constitute a complaint:
 - a request for general information or a general statement
 - an "objection" the rules or cases for the lodging of which are laid down in Act XLIX of 1991 on bankruptcy and liquidation proceedings and in the relevant provisions of Act V of 2006 on the register of companies, judicial proceedings and winding-up
 - Complaints Handling Coordinator: the staff member(s) appointed by the Winding-up Board to receive and organise customer complaints, whose duties are carried out by the person designated for this purpose at the head office of the Winding-up Board.
- Client: any natural person, legal entity or unincorporated body that has a complaint against the winding-up body in relation to a specific activity or service provided by the latter. In this context, any person who comes into direct or indirect contact with the activities of the Winding-up Body shall be considered a client.

4. Procedure for handling complaints

4.1.

The winding-up body shall accept complaints in writing, or in exceptional cases, as specified below, orally. In exceptional cases, the complaint shall be made orally and in person at the head office of the Winding-up Board, and shall be recorded in writing by the primary complaints coordinator or the staff member in contact with the customer, using the form (Annex 1).

The Winding-up body shall receive and treat as a complaint all letters, faxes and e-mails which correspond to the definition in point 3 above.

In the event of a complaint made by telephone or in person at the liquidator's head office, the Complaints Coordinator will consult with the complainant and request that the complaint be made in writing (letter, fax, email). If the complainant is unable to complete the written form through no fault of his/her own (illiterate, visually impaired, age, health), the Complaints Coordinator will record the complaint in writing on a form (Annex 1) at the request of the complainant.

4.2. Receipt of complaint reports

The reception and receipt of complaints is primarily the responsibility of the Complaints Coordinator and of the staff in direct contact with the customer. However, in the event that the Complaints Coordinator is unavailable, all staff shall be required to record or receive the complaint in an appropriate manner. Complaints are received at the head office of the Winding-up Board, at the Secretariat, between 8 a.m. and 4 p.m. on working days. Complaints received by e-mail or fax after 4 p.m. on working days or on public holidays, Sundays and public holidays shall be processed by the Complaints Coordinator within the next three working days.

4.2. Complaints handling procedures

The procedure is set out in a flow chart in Annex 2 to these Rules.

Once the complaint has been registered, the Complaints Coordinator will examine the submission and, if there is a classification issue, will consult with the head of the liquidating organisation (or a designated manager). In the case of an administrative problem, if a solution has been found after consultation with the manager, the complaint or problem has been resolved. If the complaint is of a professional nature, the discussion should be conducted with the person concerned by the complaint. If the complaint is unsuccessful, it will be forwarded to the head of the Winding-up body, who, with the assistance of the Complaints Coordinator, will reply in writing to the customer within 30 days of the complaint being lodged, giving reasons for the reply.

If the reply is accepted, the problem is resolved.

5. Concluding provisions

5.1 The management of the winding-up body shall be informed by the Complaints Coordinator of the data and practical experience of the complaint handling activity.

5.2 The forms completed in relation to customer complaints will be retained by the administration and kept on file for 3 years. The administration also keeps a separate register of complaints (Annex 3).

5.3 These Rules shall be displayed at the headquarters of the Winding-up Board.

5.4 These Rules shall enter into force on 15 February 2021.

Annex 1: APPLICATION / PAYMENT DOCUMENT

Client name:

Address:

Mother's name:

Phone number:

Client number:

Date of report / complaint: (year, month, day, hour):

Type of report / complaint:

o Professional in nature:

- Bankruptcy proceedings

- Winding-up proceedings

- Winding-up

- Restitution of assets

- Municipal debt settlement procedure o Due to registration or administrative errors o Due to other reasons

Notification/Content of the application/Panama:

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Description of immediate action (if necessary):

Customer signature:

Signature of receiving staff member:

P.H.

Complaint

Receipt of Annex 2

Complaint

Investigation of complaint

Complaint

Flowchart of the complaints handling policy

Annex 3

COMPLAINT REGISTER

ACTION:

File number: complaint file number:

Date of receipt of complaint

Source of receipt of complaint

Type of complaint

Response

Date of reply:

Responsible: