

SIA "LANDE PLATFORM"

CLIENT COMPLAINT HANDLING POLICY

### 1. GENERAL PROVISIONS

- 1.1. This Client Complaint Handling Policy ("**Policy**") establishes the procedure for submitting a complaint to SIA "LANDE Platform," unified registration number: 40203386735, legal address: Roberta Hirša iela 1, Riga, LV-1045, Latvia ("**Platform Operator**") regarding the services provided by it.
- 1.2. This Policy applies to individuals who have become users ("Clients") of the publicly available website www.lande.finance.eu ("Platform") provided by the Platform Operator and who have opened a user account.
- 1.3. The Policy does not apply to complaints filed by individuals or organizations that are not Clients of the Platform Operator. If the Platform Operator has received a complaint from a person who is not a Client, the Platform Operator will direct the person to whom the complaint should be addressed, if possible.

#### 2. CONDITIONS FOR ACCEPTANCE OF COMPLAINTS

- 2.1. Any Client who is dissatisfied with the services provided by the Platform Operator or has identified deficiencies or dishonesty is entitled to submit a complaint to the Platform Operator. This Policy explains how to submit a complaint to the Platform Operator shall take upon receiving a complaint from a Client.
- 2.2. When submitting a complaint to the Platform Operator, all the following conditions must be met:
- 2.2.1. the complaint may be submitted by the Client or the Client's representative who is duly authorized;
- 2.2.2. the complaint must be submitted in writing by completing the complaint submission Form ("Form") in English, Latvian, Lithuanian, or Romanian;
- 2.2.3. the Form must be signed with a secure electronic signature (if submitted electronically to the Platform Operator) or with a handwritten signature (if submitted to the Platform Operator in paper Form by mail) or from the Client's personal Platform account;
- 2.2.4. the complaint must be submitted in accordance with the conditions and rules specified in this Policy.

## 3. HOW TO SUBMIT A COMPLAINT

- 3.1. The Client is entitled to submit a complaint to the Platform Operator free of charge, and the Platform Operator will consider it free of charge. However, the Client is responsible for the costs associated with writing the complaint.
- 3.2. To submit a complaint, the Client must complete the <u>Form</u> in writing, following the specified rules, and submit it electronically to the Platform Operator's Client (Investor) Service Department or Client (Project Owner) Relations Department, by sending it to the Platform Operator's email address: support@lande.finance.
- 3.3. The Platform Operator will only consider those complaints that are submitted in accordance with the conditions and rules specified in this Policy.

### 4. INFORMATION AND EVIDENCE

- 4.1. When completing the Form, the complainant must provide the requested information, namely:
- 4.1.1. Client's identification data (for a natural person- name and surname, for a legal person- its name, registration number, and LEI number) and contact information (email and address);
- 4.1.2. identification data of the Client's legal representative (for a natural person-name and surname, for a legal person-its name, registration number, and LEI number) and contact information (email and address) (if applicable);

- 4.1.3. information about the subject of the complaint (reference to the investment and/or agreement to which the complaint relates, summary of the complaint, dates of the facts of the complaint, information about the damage, loss, or negative impact caused to the Client, information about other notes or relevant information).
- 4.2. In order for the Platform Operator to investigate the complaint, the complainant must provide written evidence, i.e., information and documents confirming the existence of the complaint and on which the complaint is based. The complainant must ensure that the written evidence is in Latvian or English, or if it is in another language, it is translated into Latvian or English and the translation is notarized.
- 4.3. If the complaint is submitted on behalf of the Client by a representative (authorized person), the Client's representative must submit to the Platform Operator a document or power of attorney confirming its right to represent the Client.
- 4.4. The Form must contain only true, accurate, and up-to-date information.
- 4.5. The Client is obliged to provide the information and documents requested by the Platform Operator within the deadline specified by the Platform Operator, which shall not be less than 5 (five) working days, regarding the facts and circumstances stated in the complaint.

## 5. CONFIRMATION OF RECEIPT OF COMPLAINTS

- 5.1. The Platform Operator will confirm the receipt of the complaint within 10 (ten) working days from the date of its receipt by sending the complainant the relevant confirmation to the email address specified in the submitted Form.
- 5.2. The confirmation from the Platform Operator will include the following information:
- 5.2.1. whether the complaint submitted by the complainant is acknowledged as 'accepted' or 'not accepted';
- 5.2.2. if the complaint is acknowledged as 'not accepted'- the Platform Operator will provide an explanation of the reasons for this decision:
- 5.2.3. if the complaint is acknowledged as 'accepted' the Platform Operator will provide information about the deadline by which its response to the complaint will be provided, and information about the Platform Operator's Client Service Department responsible for investigating the complaint (indicating the email address and phone number of this department) and with which the complainant can contact during the investigation of the complaint.

## 6. COMPLAINT INVESTIGATION

- 6.1. Upon receipt of a complaint acknowledged as 'accepted', the Platform Operator will promptly assess whether the complaint is clear and complete and contains all the necessary evidence and information. The Platform Operator will also compile and examine all essential evidence and information related to the complaint. If the Platform Operator finds that the complaint is unclear or incomplete, it will request additional evidence and information from the complainant or third parties necessary for the investigation of the complaint.
- 6.2. The Platform Operator will inform the complainant of the progress of the complaint investigation and will promptly respond to requests for information.
- 6.3. The Platform Operator will consider and respond to a complaint acknowledged as 'accepted' within 30 (thirty) days from the date of its receipt. If the Platform Operator cannot provide a response within this timeframe, it will send the complainant information about the extension of the deadline, explaining the reasons for the delay and indicating when it will be able to complete the investigation of the complaint, to the complainant's email address specified in the Form.

6.4. The Platform Operator makes decisions on the investigation of complaints consistently, making the same decisions for concordant cases.

### 7. RESPONSE TO COMPLAINT

- 7.1. After investigating the submitted complaint and its evidence, the Platform Operator will provide the complainant with a written response to the complaint, sending it to the email address specified in the Form. In the response, the Platform Operator will provide:
- 7.1.1. the results of the investigation; and
- 7.1.2. a response to the complaint, stating the reasons for it.
- 7.2. If the response is unsatisfactory or only partially confirms the complaint, the Platform Operator will provide information about accepting such a response and will also inform the complainant of the opportunity to:
- 7.2.1. submit a complaint to the Bank of Latvia. Detailed information about the Bank of Latvia and the procedure for submitting complaints is available on the website: https://www.bank.lv;
- 7.2.2. if, according to the Consumer Rights Protection Law, the Client is considered a consumer, the Client has the right to submit a complaint to the Consumer Rights Protection Center. Detailed information about the Consumer Rights Protection Center and the procedure for submitting complaints is available on the website: http://www.ptac.gov.lv/;
- 7.2.3. to file a complaint to the courts of the Republic of Latvia per the current legislative acts of the Republic of Latvia.

#### 8. MONITORING AND RECORD KEEPING

- 8.1. The Company maintains a record of the complaints received. The received complaints are registered in the Company's records- the Company's complaint register:
- 8.1.1. indicating the Complaint registration number;
- 8.1.2. indicating the Complaint date;
- 8.1.3. providing information about the Client (Client's name, surname, contact information);
- 8.1.4. indicating information about the Client's authorized representative (if applicable);
- 8.1.5. indicating the date of sending the Complaint confirmation, the date of response, and necessary improvements to the Company's processes/documents.
- 8.2. The Company's Legal and Compliance Department monitors the process of handling Complaints and providing responses.
- 8.3. Every quarter, the Company's Legal and Compliance Department analyzes the data on Complaint handling to ensure that repeated or systemic problems are identified and addressed, as well as the possible legal and functional risks, by analyzing the reasons for individual Complaints to identify the main causes characteristic of the respective type of complaints, considering whether such causes may also affect other Company processes, including those for which no direct Complaints have been received, and eliminating such causes, if justified, to ensure the effectiveness of the Complaint handling process, prevention of potential conflicts of interest, and compliance with internal reporting under this Procedure.
- 8.4. If the Company's Legal and Compliance Department, when reviewing information about Complaints, finds that improvements are necessary, it decides on an action plan with tasks, deadlines for their implementation, and responsible persons.

# 9. FINAL PRAOVISIONS

- 9.1. The Policy and its amendments are approved by the Company's Management Board.
- 9.2. The compliance of the Policy with the Company's activities and the factors affecting it are reviewed annually.
- 9.3. The Company informs all Employees about any significant amendments to the Policy, introducing them to the updated version and points of the Policy and ensuring its availability to Employees.
- 9.4. The Policy is published in the Company's internal system OneDrive, and its original is stored following the Company's internal regulations for document storage.