

Information regarding the internal complaint procedure of NLB d.d.¹

In accordance with the acts governing the provision of banking and financial services, Nova Ljubljanska banka d.d., Ljubljana (hereinafter: NLB) is obliged to provide to its clients information on the internal complaint procedure system, and the selected provider and method of out-of-court resolution of consumer disputes. It is deemed that the client has been informed of such information if the information has been published on the NLB website and in a visible place in all premises where the NLB or its authorised person does business with the clients.

Definitions of terms

A **client** is a natural or legal person that is using at least one NLB product or service, or that ordered a service from or was provided a service by the NLB.

A **complaint** is an expression of dissatisfaction due to which the client objects to the actions of the NLB related to the implementation of contracts, provision of services and transactions between the NLB and the client. With a complaint, the client demands the elimination of irregularities claimed in it and establishment of the correct state, and possibly compensation for any direct or indirect damage.

A **financial complaint** is a client's claim for the elimination of an error in the performance of a payment transaction.

A **compensation claim** is a type of complaint in which a client demands that the NLB compensate the damage directly or indirectly arising from its operations or omission or incorrect performance of a transaction.

A **complaint concerning the protection of confidential and personal data** is a type of complaint that involves a suspicion of unauthorised data processing.

Special complaints are complaints addressed to the Management Board of the NLB; complaints without a specific addressee or complaints addressed to the NLB by various external institutions.

The **body resolving complaints at first instance** is an organisational unit that takes care of the relationship with the client or a unit in which the client has opened a transaction account or a unit that performed the transaction which is the subject of the client's complaint.

The **body in charge of the second level of complaint processing** is a special centralised organisational unit responsible for handling the client's objections against the decisions adopted by the body of first instance, all special complaints and compensation claims of higher values.

A **business secret** means any information which could obviously cause material damage to the NLB, the clients and the employees if submitted to unauthorised persons.

Client complaint handling procedure

The following means are available to clients for submitting a complaint to the NLB:

- **in writing** – personal, by mail, telefax, to any of the e-addresses published on the NLB Web Portal (on the website www.nlb.si), or to the e-mail of the competent contact person at the NLB, through the online banking service NLB Klik (users), via the electronic banking NLB Proklik (users), through Klepet or through the form on the NLB Web Portal (<http://www.nlb.si/kontakt>);
- **orally** – personally, by phone (01 477 20 00 or telephone number of the competent contact person at the NLB) or via Video Call. The NLB is only obliged to respond to the complaints submitted in writing.

A complaint must include the following mandatory elements:

- identification data of the client (name and surname, permanent or temporary residence of the client, their legal representative or authorised person or name and registered office of a legal person or person performing activity);
- explanation of the reasons for complaint and the date of the event;
- indication of the invoice or documents to which the complaint is related (copies of documents if necessary for assessing the grounds of the complaint);
- contact data for sending a reply;
- signature of the client or a legal representative or authorised person of a client in the case of a written complaint.

Compensation claims, client's objections against the decisions adopted by the body of first instance and complaints concerning the protection of confidential and personal data must always be made in writing. In the case of a financial complaint in the area of card and ATM transactions, the client must fill out and sign the relevant applicable form, which is available in all NLB branch offices. The NLB only handles complaints that are complete and correctly submitted. If a client's complaint is incomplete, the relevant organisational unit shall ask the client to supplement it no later than on the business day following the day of receipt of the complaint.

The handling of compensation claims of higher values, special complaints and complaints concerning the protection of confidential and personal data in the NLB is carried out at one level and is centralised. Compensation claims of higher values, special complaints are handled by the organisational unit in charge of the second level of complaint processing, while complaints concerning the protection of confidential and personal data are handled by the organisational unit responsible for compliance and integrity. Both organisational units handle complaints entirely autonomously and independently. A two-level complaint processing system has been set up for handling all other complaints in the NLB.

Regardless of the level of handling the complaint, the following deadlines for resolving complaints apply:

- **Complaints relating to retail operations are resolved in the shortest possible period of time and within 8 days at the latest.** The deadline for resolving the complaint begins on the day following the day of receipt of a complete or supplemented complaint – the deadline of 8 days includes non-working days, i.e. Saturdays and Sundays, and statutory holidays.
- **Complaints relating to corporate operations and professionals are resolved in the shortest possible period of time and within 15 days at the latest.** The deadline for resolving the complaint begins on the day following the day of receipt of

a complete or supplemented complaint – the deadline of 15 days includes non-working days, i.e. Saturdays and Sundays, and statutory holidays.

- **Complaints concerning the protection of confidential and personal data** shall be resolved in accordance with the provisions of the legislation regulating personal data protection within 30 days of the receipt of the complaint. If the client cannot be submitted an answer within the prescribed deadline, the NLB shall inform it of the reasons for extending the deadline and the expected date for submitting the answer.

Out-of-court resolution of consumer disputes

For the entire duration of the complaint procedure, the NLB and the client may reach a settlement regarding the subject of dispute, as defined in the client's complaint.

In accordance with the Out-of-Court Consumer Dispute Resolution Act (ZIsRPS), the NLB has out-of-court consumer dispute resolution providers (OCDR providers). It chose the **Bank Association of Slovenia (Združenje bank Slovenije - GIZ), Ljubljana, Šubičeva ulica 2, 1000 Ljubljana** and the **European Centre for Dispute Resolution (ECDR), Tomšičeva ulica 6, 1000 Ljubljana**.

If the client, who is a consumer (a natural person acquiring or using goods and services outside their professional or profitable activity), does not agree with the final decision adopted in the internal complaint procedure of the bank or if the bank fails to decide on their complaint within 15 days, there are two external institutions available for out-of-court dispute resolution, namely the Bank Association of Slovenia or the European Centre for Dispute Resolution (ECDR).

The client has the right to propose initiation of the mediation and proposal procedure by ordinary mail to the address Zdrženje bank Slovenije - GIZ, Ljubljana, Šubičeva ulica 2, 1000 Ljubljana, telephone: +386 1 242 97 00, with the note: OCDR initiative, or via e-mail to the address: izvajalec.irps@zbs-giz.si; it must do so in accordance with the Rules of Procedure on Out-of-Court Consumer Dispute Resolution of the Bank Association of Slovenia. The mediation and proposal procedure is conducted by the mediator in the dispute, whose aim it to achieve agreement between the parties. If no agreement can be reached, the mediator issues a non-binding opinion. The procedure is free of charge for the client. Find more information on the website of the BAS: <http://www.zbs-giz.si>.

A client is entitled to bring the dispute for mediation to the European Centre for Dispute Resolution (ECDR), Tomšičeva ulica 6, SI-1000 Ljubljana, telephone: 08 20 56 590, or by e-mail to the address: info@ecdr.si, in accordance with the ECDR rules on mediation. The mediation procedure is conducted by a mediator who actively helps the parties to settle the dispute by agreement. The agreement reached through mediation can be, if the parties agree, written in a legal form with the power of a final judgement. The procedure is free of charge for the client. Further information is available here: <http://www.ecdr.si/>.

A client (initiator) may file an initiative with only one of the above providers. It is deemed that, when filing an initiative with one of the selected providers, the initiator started the procedure of out-of-court resolution of consumer dispute, and therefore may not file an initiative concerning the same dispute with the other provider.

Costs of procedure

Each party shall cover its own costs of complaint resolving in an internal complaint procedure. The NLB shall be entitled to the compensation of all costs should the client withdraw the complaint, and to a compensation for any damage and costs incurred by the NLB as a result of intentional act or negligence on the part of the client.

Protection of confidential data

The content of the complaint and all data relating to the progress of the complaint procedure are confidential and a business secret, and the client shall be liable for damages in the event of abuse of the business secret by acting in contravention of the law.

¹ More information on the internal complaint procedure in NLB d.d. is available in the document Internal complaint procedure of NLB d.d. published on the NLB Web Portal (<https://www.nlb.si/pritozbeni-postopek>).