

# **Procedure for Submitting Complaints**

## **PROCEDURE FOR HANDLING COMPLAINTS**

CAPITAL MARKETS, o.c.p., a.s.

### **Article 1**

#### **General Provisions**

##### **1.1**

These Rules for Handling Complaints of CAPITAL MARKETS, o.c.p., a.s., Slávičie údolie 106, 811 02 Bratislava, Tax ID 36 853 054 (hereinafter referred to as the “Company” or the “Broker”) regulate all legal relations arising between the Client (including potential clients) and the Company in connection with or resulting from complaints submitted by Clients specified in Section 1.5 of these Rules for Submitting Complaints against the Company. These complaints concern the quality or accuracy of investment services, auxiliary services, the performance of investment activities or their combination, and the performance of financial services and activities (hereinafter collectively referred to as the “Services” and “Activities”), which the Company provides to Clients under contracts concluded between the Company and the Client, particularly the procedures and deadlines for handling such complaints, the method of covering costs associated with such complaints, and all other related legal relations.

##### **1.2**

If any provisions of the Company’s General Terms and Conditions (GTC) differ from the provisions of these Complaint Handling Rules, the provisions of the GTC shall take precedence over the individual provisions of these Complaint Handling Rules.

##### **1.3**

Terms written in capital letters used in these Complaint Handling Rules have the meanings defined in the GTC for individual services and financial instruments unless otherwise specified in these Complaint Handling Rules.

##### **1.4**

A “complaint” under these Complaint Handling Rules means a complaint by a Client asserting their right to claim liability for defects caused in connection with the provision of services and activities against the Company within the time limits set out in these Rules (hereinafter referred to as a “Complaint”).

### **Article 2**

#### **Procedures and Deadlines for Handling Complaints**

## 2.1

The Client has the right to submit a complaint to the Company.

## 2.2

The Client is obliged to submit a complaint in the manner specified in Section 2.4 of these Rules within six months from the date on which the Client had the opportunity to become aware of the fact that is the subject of the Complaint or from the date on which the defect could have been detected unless otherwise expressly agreed between the Company and the Client. If a generally binding legal regulation stipulates a longer liability period for defects in goods or services provided by the Company than that specified in the first sentence of this section, and if that regulation does not allow the contractual parties to agree on a shorter period, the Client is entitled to submit a complaint within the statutory timeframe.

## 2.3

If the Client fails to notify the Company within the period stated in Section 2.2 of these Rules, the Client's rights arising from liability for defects shall expire.

## 2.4

The Client must submit the complaint in writing with a handwritten signature. The written complaint must include the Client's identification details: name (or business name), personal or company identification number, address (registered office or place of business), client account number, and contact information (phone number), as well as the date and Client's signature. The Client must clearly, comprehensibly, accurately, and precisely describe the subject matter of the complaint, including relevant data, numbers, amounts, and must provide credible evidence, especially legally relevant documents, obtained at their own expense. The Client must also indicate the rights being asserted against the Company. Complaints must be delivered to the Company's registered office or sent by e-mail to: [info@capitalmarkets.sk](mailto:info@capitalmarkets.sk).

## 2.5

If the Client fails to fulfil the obligations listed in Section 2.4, the Company is not obliged to handle or assess the justification of the complaint until the deficiencies are corrected. Once the Client remedies the deficiencies, the deadlines stated in Section 2.9 begin to run.

## 2.6

The Client must provide the Company with all necessary cooperation to clarify the complaint. If the Client refuses to do so, the Company is not obligated to continue investigating or assessing the legitimacy of the complaint.

## 2.7

The compliance department is responsible for handling complaints and for monitoring

received and resolved complaints in accordance with the Company's organizational rules.

#### 2.8

The Company shall collect and verify all relevant evidence and information regarding the complaint and communicate with the Client in a clear, simple, and understandable manner.

#### 2.9

If it is not possible to decide on the legitimacy of the complaint immediately after its submission, the Company may review and professionally assess the claimed defect. The overall resolution of the complaint should not exceed 30 calendar days.

#### 2.10

If, for objective reasons, the complaint cannot be resolved within the 30-day period, the Company must inform the Client about the reasons for the extension, the measures taken, and the expected date of resolution.

#### 2.11

The Company shall issue to the Client a written confirmation of the manner of resolution within the deadlines stated in Section 2.9, even if the complaint is not upheld in full.

### **Article 3**

#### **Costs Related to Complaint Handling**

#### 3.1

Unless otherwise specified in these Rules, the Company shall bear the costs associated with the resolution of the complaint regardless of whether the complaint is justified. This does not include the Client's own costs related to the submission of the complaint.

### **Article 4**

#### **Complaint Records**

#### 4.1

Complaints are recorded in written form, with the following details for each case:

- a. serial number of the complaint,
- b. date of receipt,
- c. client identification,

- d. subject of the complaint,
- e. decision on complaint resolution.

#### 4.2

A copy of the response letter and record of the complaint resolution shall also be archived under the serial number.

#### 4.3

The record of complaint resolution must include:

- a. name, surname, and address (or company name and registered office),
- b. subject of the complaint,
- c. date of receipt,
- d. identification of persons involved,
- e. assessment of the complaint's legitimacy,
- f. measures taken to resolve it,
- g. date of resolution.

## **Article 5**

### **Appeals Procedure**

#### 5.1

If the Client is not satisfied with the complaint resolution, they may appeal within fifteen (15) calendar days from receiving the decision to the address of residence/registered office or another designated delivery address. In this case, a new 30-day resolution period begins.

#### 5.2

The appeal is handled by the head of the compliance department (Compliance Officer), who issues a decision on the outcome. The Client or potential Client shall be informed in the same manner as in the complaint handling process, within 30 calendar days of receipt.

#### 5.2

Alternatively, the appeal may be handled by the Company's Board of Directors, which will issue a decision on the complaint outcome. The Client or potential Client will be informed by registered letter within 30 days of the Company's receipt of the appeal.

#### 5.3

If the Company's response does not fully meet the Client's expectations, the Client may contact the Narodna banka Slovenska as the competent supervisory authority.

#### 5.4

The Client may also file a proposal for alternative dispute resolution (ADR) with one of the entities listed by the Ministry of Economy of the Slovak Republic at

www.economy.gov.sk in accordance with Section 24(1)(a) of Act No. 391/2015 on Alternative Dispute Resolution for Consumer Disputes.

## 5.5

For services provided in the Czech Republic (e.g., through a branch), the Client, as a consumer within the meaning of Section 2(1) of Act No. 634/1992 Coll., has the right to:

- (i) file a lawsuit with the competent Czech court, or
- (ii) submit a proposal for out-of-court dispute resolution under the above-mentioned law.

The competent body for out-of-court dispute resolution is the Financial Arbiter, pursuant to Act No. 229/2002 Coll. on the Financial Arbiter.

More information is available at:

Address: Legerova 1581/69, Prague 1, 110 00

Phone: +420 257 042 070

E-mail: [arbitr@finarbitr.cz](mailto:arbitr@finarbitr.cz)

Website: <https://www.finarbitr.cz/cs/>

For services provided in the Czech Republic, the Client can also contact the Czech National Bank (ČNB) as the supervisory authority:

Address: Na Příkopě 864/28, 115 03 Prague 1

E-mail: [podatelna@cnb.cz](mailto:podatelna@cnb.cz)

Web:

<https://www.cnb.cz/cs/verejnost/kontakty/stiznostina-financni-institute/index.html>

## Article 6

### Internal Monitoring and Evaluation of Complaints

#### 6.1

The Company continuously analyzes data obtained during complaint resolution to identify and address recurring systemic issues and potential operational or legal risks, especially by:

- a. analyzing the causes of individual complaints to identify common root causes,
- b. assessing whether these causes may affect other processes or products (even if unrelated to the specific complaint),
- c. eliminating those root causes when appropriate.

## Article 7

### Final Provisions

### 7.1

The Company and the Client agree that other legal relationships between the Company and the Client that are not expressly governed by these rules for filing complaints shall be governed by the relevant provisions of individual agreements concluded between the Company and the Client, the relevant provisions of the GTC, the relevant provisions of related legal regulations applicable in the Slovak Republic or the Czech Republic, and the relevant provisions of the Civil Code of the Czech Republic.

### 7.2

The complaint procedure does not apply to services and activities that are not supervised by the National Bank of Slovakia or another regulatory body, nor to services provided by another entity for which the Company is not responsible. In such cases, the Company shall inform the Client of its position and, when possible, provide contact information for the responsible entity or authority.

### 7.3

Upon request from the competent national authority, the Company shall provide information regarding complaint handling.

### 7.4

The Company is entitled to amend or supplement these rules for handling complaints at any time due to changes in the Company's business policy or changes in legislation, or based on developments in the financial market or developments in the legal or business environment, or in the interests of the secure functioning of the financial market system or risk minimization. The Company shall determine the current version of the Rules for Handling Complaints by publishing them on the Company's website at [www.capitalmarkets.sk](http://www.capitalmarkets.sk). The client is entitled to express their disagreement with the change to the Complaints Handling Rules by written notice delivered to the company within 30 days of the Complaints Handling Rules being determined by their publication. If they fail to do so, the changes and additions shall take effect on the date specified therein, if, after the publication of the complaint procedure, the client performs any action towards the company or continues to accept the company's services in such a way that it is clear from the situation that they wish to continue the contractual relationship with the company or confirms by their actions that they have familiarized themselves with the wording of the amended or supplemented complaint procedure. If the client expresses disagreement with the change in the complaint procedure within the specified period and no agreement is reached, the client is entitled to terminate the contractual relationship with the company with immediate effect. Similarly, in such a case, the company is entitled to terminate the contractual relationship with the client with immediate effect and declare its claims against the client immediately due and payable.

## 7.5

These Complaint Handling Rules were approved by the Company's Board of Directors on 9 October 2023, effective from 24 October 2023. All contractual relationships concluded between the client and the company from the effective date of these rules for filing complaints are governed by these rules for filing complaints, unless otherwise specified in these rules.

## 7.6

The rules for filing complaints were published on October 9, 2023.

## 7.7

The Complaint Procedure was amended on 21 January 2026 and becomes effective on 1 March 2026.