— COMPLIANCE · COMPLAINTS HANDLING

Complaints *procedure.*

How to submit a complaint, how we handle it and who you can turn to. Transparent, as it should be.

— DOCUMENT CONTROL

REVISIONS				
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01 Definitions

Complaint: any explicit or implicit expression of dissatisfaction or grievance concerning an act or omission of Promega Service GmbH (Workont) or of Treezor SAS in connection with the Workont platform or the Services, irrespective of the channel used and even in the absence of a contractual relationship. For traceability purposes, Promega invites complaints to be formalised in writing. Mere requests for information, clarification or operational assistance that do not contain any grievance are not considered complaints.

Customer: the entrepreneur (§ 14 BGB) who has or has had a contractual or pre-contractual relationship with the Company.

Submitter: the person who submits the complaint, whether on their own behalf or on behalf of another.

Complainant: the person on whose behalf the complaint is submitted.

Complaints register: the electronic tool in which the essential data of the complaint are recorded and retained.

Issuer: Treezor SAS, an electronic money institution authorised by the Autorité de Contrôle Prudentiel et de Résolution (ACPR), the sole provider of the payment services accessible through the Workont platform. The current contact details and the means of submitting a direct complaint are published at www.treezor.com and governed by the DETCs (Klausel 12).

02 The operational flow of complaints handling

The stages of the complaints-handling process are:

- Stage 1 — Receipt and intake of the complaint
- Stage 2 — Logging of the complaint
- Stage 3 — Examination of the complaint
- Stage 4 — Assessment and outcome of the complaint
- Stage 5 — Communication to the Customer
- Stage 6 — Closure of the complaint

2.1 Stage 1 — Receipt and intake of the complaint

Promega Service GmbH (Workont), as partner and agent of the Issuer Treezor SAS, is the primary point of contact for its customers' complaints. The Customer must turn first to Promega before contacting the Issuer directly, as is moreover expressly recommended by Treezor SAS on its official channels.

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The back office is responsible for taking in the complaints received from customers and forwarding them immediately to the Complaints Office. The Complaints Office is made up of 2 (two) persons dedicated to complaints handling: a Head of the Complaints Office, responsible for supervising the investigation, for the decision and the final reply to the Customer, for record keeping and for compiling statistics, and a Complaints Officer, who also performs the back-office intake function and is responsible for the receipt, logging and investigation of the complaint. The Complaints Office operates in a functionally autonomous manner, separate from the operational, commercial and support functions, in accordance with the BaFin requirements on complaints handling and the instructions of the Issuer Treezor SAS. The composition and staffing of the Complaints Office are communicated to Treezor SAS. Forwarding takes place by assigning the ticket on the CRM to the members of the Complaints Office, with a corresponding notification.

In accordance with Article 17.2 of the Terms and Conditions of the Workont service, the complaint is submitted preferably in writing through one of the following official channels:

- **completion of the online complaints form available at https://workont.com/reclami/;**
- sending the completed complaints form — or a letter containing the same essential information — to the dedicated email address complaints@workont.com.

Complaints may be received through any channel (online form, email, post, telephone or in person), and no complaint may be refused on account of the channel used. To ensure traceability, Promega invites the Customer to formalise the complaint in writing through the online form or the dedicated email address, or by post to Promega Service GmbH — Complaints Office — Karlstraße 16, 40210 Düsseldorf. Where the grievance is expressed verbally (by telephone or in person) and the Customer does not proceed to formalise it, the staff member receiving it draws up a written summary and records it in the complaints register, taking it forward in accordance with this procedure. Mere requests for operational, commercial and technical assistance — handled through the assistance telephone number and the email address support@workont.com — do not in themselves constitute a complaint; however, where dissatisfaction is expressed through those channels, it is treated as a complaint within the meaning of this procedure.

In the event of loss, theft or unauthorised use of a payment card, the card is blocked directly by the Customer through their secure customer area (dashboard), in the “Cards” section, by selecting the relevant card and activating the blocking function, in accordance with Article 10.3 of the Terms and Conditions of the Workont service; Promega does not operate a 24-hour (round-the-clock) telephone card-blocking service. Requests relating to the protection of personal data (Art. 15-22 GDPR) are handled through the dedicated address privacy@workont.com.

In the relevant sections, to facilitate the categorisation of requests and complaints, a drop-down menu is provided with the following categories:

- Information / advice
- Quality of the offer
- Fees and charges
- Non-execution or defective execution of a transaction
- Delays in processing a transaction
- Malfunctions

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- Dispute of a transaction for lack of authorisation (including fraud, loss or theft of payment instruments)
- Problems with the account
- Account opening
- Account closure
- Account blocking
- Request for debit cards
- Processing of personal data (GDPR)
- Other

Where complaints are received not through the official channels but through Promega's general mailboxes, they are duly forwarded to the dedicated mailbox complaints@workont.com. Users are informed of this by means of an acknowledgement of receipt setting out the handling time limits.

On receipt, the responsible back-office staff member ensures that the report contains the information required for it to be considered "actionable", namely:

- the presence of the master data enabling the complainant to be identified (company name, VAT or tax number, address, any powers of representation);
- the clear indication of the service to which the complaint relates and of the content of the complaint itself;
- where relevant, the details of the disputed transactions (date, amount, beneficiary, transaction ID) and any element useful for the assessment.

Where some information useful for intake is missing (and cannot be independently traced through the company's applications), the staff member invites the Customer by email to supplement the report with such data.

2.2 Stage 2 — Logging of the complaint

The complaints received are processed and "logged" by the back-office team in the ticketing system, which serves as the complaints register. The documentation received by email is retained therein for the period provided for by law or by the supervisory rules and for the entire duration of the contractual relationship.

On receipt of the email, the ticketing system automatically assigns the ticket the subject "Complaint" and a number (Case Number) used to track, handle, assign and archive the request. The system automatically assigns: the identification number of the Case; the due date for handling the complaint; the maximum number of days within which it is to be handled.

For each complaint, the ticketing system must record:

- the date of receipt and the date of intake of the report;
- the first and last name of the complainant and of the submitter;
- the type / category of the complaint;
- the actionability / non-actionability of the complaint;
- the status of the complaint (under examination, upheld, rejected);

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- the wording of the grievance;
- the nature (economic or non-economic) of the loss suffered by the Customer;
- the amount of the loss suffered by the Customer (where quantified or quantifiable);
- an indication of whether the complaint concerns matters within the exclusive competence of the Issuer Treezor SAS, for forwarding purposes.

It is the responsibility of the staff member to whom the ticket is assigned to verify the completeness of the information. Where the complainant is not a Customer, the staff member records their master data, which are linked to a "light" master record created during the logging stage. Regardless of the channel through which the complaint is received, it must be recorded in the complaints register as soon as possible, with the relevant correspondence also being stored.

2.3 Stage 3 — Examination of the complaint

The back office is responsible for receiving the complaint and forwarding it to the Complaints Office by email. The handling of the complaint is the responsibility of the Complaints Office, which is responsible for record keeping and for compiling the complaints-related statistics, which are to be communicated to Treezor SAS and, through it, to the competent supervisory authorities (ACPR and BaFin).

The Customer is informed of the proper receipt of the complaint by means of the "acknowledgement of receipt" within 10 (ten) business days of receipt, in line with the time limit adopted by the Issuer in its DETCs (Klausel 12). The communication takes place through the same channel used by the Customer. The acknowledgement of receipt states at least: the maximum time limit within which the reply will be provided; the contact details of the office handling the complaint; any forwarding of the complaint to the Issuer; the possibility of turning to the Schlichtungsstelle bei der Deutschen Bundesbank where the relevant conditions are met; and the link to the complaints page (https://workont.com/reclami/). Where the complaint is resolved at the same time as intake, the staff member immediately provides notice of resolution. The time limits referred to in this Section run from the date on which the Customer sends the complaint; for complaints sent by post, the postmark serves as evidence of the date of dispatch.

Where the complaint concerns matters within the exclusive competence of the Issuer Treezor SAS (e.g. execution of SEPA credit transfers, direct debits, blocking and operation of the cards, unauthorised transactions, chargebacks, account keeping, safeguarding of funds), Promega forwards the complaint without delay to the Issuer at the dedicated address reklamationen@treezor.com, so that it may carry out the assessment for the matters within its competence in accordance with the procedures provided for in the DETCs. Only subsidiarily, and after having submitted the complaint to Promega without a satisfactory reply, does the Customer retain the possibility of turning directly to the Issuer in accordance with the means provided for in the DETCs (Klausel 12).

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In accordance with § 62 Abs. 3 ZAG and Article 101 of Directive (EU) 2015/2366 (PSD2), the Company provides the Customer with a reply within 15 (fifteen) business days of receipt. In exceptional cases not attributable to Promega, a reasoned interim reply is provided; in any event, the final reply is provided within 35 (thirty-five) business days of receipt of the complaint. For complaints that do not concern a service covered by PSD2 (e.g. KYC/KYB, account switching service and similar matters), the final reply is provided as quickly as possible and without undue delay, and in any event within 60 (sixty) business days of receipt, in compliance with the general consumer-protection time limits of German law. The time limits are monitored by the staff through the ticketing system, which generates automatic alerts at the relevant deadlines.

2.4 Stage 4 — Assessment of the outcome of the complaint

Once the examination stage is complete, the outcome is assessed. Where the complaint is found to be well-founded, the Company takes all measures aimed at remedying it; where it is found to be unfounded, an appropriate statement of the reasons for the rejection is provided. Where, owing to the nature of the complaint, the substantive decision falls to the Issuer Treezor SAS, Promega adopts the outcome on the basis of the communication received from the Issuer and forwards it to the Customer.

2.5 Stage 5 — Communication to the Customer

Once the assessment is complete, a communication is provided to the Customer in writing, through the same channel used to submit the complaint. The communication contains the summary of the complaint, the outcome (upheld, partially upheld, rejected), the reasons, any measures taken, and information on the means of out-of-court dispute resolution and supervision (see Section 4).

2.6 Stage 6 — Closure of the complaint

Following the communication to the Customer, the status of the complaint is updated in the register, thereby closing the procedure. In the event of a further complaint, where the first-instance reply is considered unsatisfactory, the matter is reopened and the documentary link with the previous complaint is maintained in the register.

03 Management of the complaints archive

The management of the complaints archive, in both paper and electronic form, is the responsibility of the Complaints Office. The complaints register, the relevant complaints and the replies are retained electronically in the technological infrastructure of Promega Service GmbH, namely for ten years pursuant to § 257 HGB and § 147 AO and for five years for the anti-money-laundering documentation pursuant to § 8 GwG. The same archiving method, by digitisation and transmission to the Company, is applied to any paper complaints. The Complaints Office is responsible for compiling the complaints-related statistics, which are to be communicated to Treezor SAS and, through it, to the competent supervisory authorities (ACPR and BaFin).

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04 Dispute-resolution procedures

Promega Service GmbH has prepared and published on its website an information sheet on the complaints and dispute-resolution procedure, in order to inform customers of the processes and procedures to be followed in the event of complaints or disputes relating to the services received. Where the Customer is not satisfied with the reply received from Promega, or has not received a reply within the time limits referred to in Section 2.3, they may turn to the following bodies:

4.1 Schlichtungsstelle bei der Deutschen Bundesbank

For disputes relating to payment and electronic-money services, the Customer — including as an entrepreneur/business customer — may turn to the Schlichtungsstelle bei der Deutschen Bundesbank, a State conciliation body whose competence in the field of payment services extends by operation of law (§ 14 UKlaG) to entrepreneurs in addition to consumers. Treezor SAS declares in its DETCs (Klausel 13) that it participates in the out-of-court conciliation procedure before that body. The means of referral, the current contact details and the procedure information sheet are published at www.bundesbank.de.

4.2 BaFin — report in the field of supervision

The Customer may also submit to the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), pursuant to § 60 ZAG, reports of suspected breaches of the rules applicable to payment service providers. A report to BaFin is not of a conciliatory nature but constitutes a supervisory measure. The current contact details and the means of reporting are published at www.bafin.de.

4.3 Subsidiary complaint to the Issuer Treezor SAS

Only subsidiarily to the complaint submitted to Promega, and for matters within the exclusive competence of the Issuer, the Customer retains the possibility of turning directly to Treezor SAS. The means, channels, contact details and time limits for a direct complaint are governed by the DETCs (Klausel 12), published at www.treezor.com, and by the service channels published at www.treezor.com (“Contact” section).

4.4 Supervisory authority for the protection of personal data

Where the complaint concerns the processing of personal data by Promega, the Customer — without prejudice to the possibility of turning to the controller at the address privacy@workont.com — has the right, pursuant to Art. 77 GDPR, to lodge a complaint with the competent supervisory authority. As the controller is established in Düsseldorf, the lead supervisory authority (Art. 56 and 60 GDPR) is the Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI NRW) — Kavalleriestraße 2-4, 40213 Düsseldorf, poststelle@ldi.nrw.de, www.ldi.nrw.de. The Italian Customer may nonetheless turn to the Italian data protection authority (Garante per la protezione dei dati personali, www.garanteprivacy.it). For the processing carried out by Treezor SAS, the Customer turns to the Data Protection Officer at the address dpo@treezor.com.

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4.5 Ordinary courts

The Customer's right to bring the matter before the competent ordinary courts remains unaffected, within the framework of Article 26 of the Terms and Conditions of the Workont service. For all disputes, the parties agree on the jurisdiction of the courts of Düsseldorf (Germany): where the Customer is a merchant, that jurisdiction is exclusive pursuant to § 38 Abs. 1 ZPO; in the other cases, in particular vis-à-vis customers established in other EU Member States, jurisdiction is agreed as a choice-of-court agreement pursuant to Art. 25 of Regulation (EU) No 1215/2012 (Brussels Ia). The power of Promega and of the Issuer to bring proceedings before the Customer's general forum remains unaffected.

4.6 Purpose of this information sheet

The essential purposes and benefits of an information sheet on the complaints and dispute-resolution procedure include:

- **Transparency and information** — clear and detailed information on how to submit complaints, which channels are available and how reports are handled.
- **Customer rights** — a statement of customers' rights in the event of a complaint, including the expected reply time limits, the possibility of referral to external bodies and reporting to BaFin.
- **Complaints-handling process** — a description of Promega's internal process for handling complaints and of the steps taken to resolve the matters raised.
- **Promega's responsibility and commitment** — the commitment to handle complaints fairly and promptly, with details on how the services are improved in response to complaints received.
- **Amicable dispute resolution** — how Promega promotes amicable settlement, for example through mediation or negotiation.

In essence, it is a key instrument for promoting transparency, trust and fairness in the relationship between Promega and its customers, helping to resolve any problems effectively and fairly.

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