

THE RULES OF HANDLING COMPLAINTS AND THE DISPUTE SOLUTIONS OF THE PARTIES OF THE TRANSACTION

I. DEFINITIONS

1. The terms indicated below are used in the rules of solving disputes of the Complaints of the Clients, except for the cases when the context requires otherwise:

1.1. Client	natural person or legal entity to whom the Operator provides the services of the Operator of the platform of crowdfunding.
1.2. Operator	The operator of the platform of crowdfunding UAB Inrento, legal entity code 305519977, the registered office: Kauno g. 22-501, Vilnius, LT-03212, Lithuania.
1.3. The Claimant	the person having lodged a Complaint regarding the services provided by the Operator and (or) the agreements made with the Operator, i. e. current or potential Client or his/her representative
1.4. Complaint	the approach submitted in writing to the Operator by the Claimant, in which it is indicated that the rights or legal interests of a person, concerning the activity performed by the Operator of the platform of crowdfunding or agreements concerning that, have been infringed, and the requirements of the Claimant are asked to be satisfied.
1.5. The Record Book of the Complaints	a paper record book or the electronic system of data registration corresponding it, in which the received Complaints of the Claimants are being registered (The recommended form of the Record Book of the Complaints is provided as the appendix No. 2 of the Rules)
1.6. The Rules	these rules of handling Complaints and the rules of solving the disputes of the parties of the transaction.

2. Other terms used in these Rules are understood the way they are defined in the Agreement of the Use of the Platform, in the Law on Crowdfunding of the Republic of Lithuania and other legislation of the Republic of Lithuania.

II. GENERAL PART

3. In these rules of handling the Complaints of the Clients and solving the disputes of the parties of the funding transaction, the process of managing the Complaints of the Clients is described, containing the processes of the submission, registration, solving, providing answer, the assessment of the results of handling Complaints, solving the disputes of the parties of funding transaction and related actions and procedures.

4. The Rules are applied to the Complaints regarding the services provided by the Operator or the agreements made with the Operator, to the extent to which it is concerned with the activity of the operator of the platform of crowdfunding performed by the Operator.

5. These Rules are not applied to other requirements claimed by the clients and (or) third parties to the Operator, as well as lawsuits, requests to execute the conditions of the agreements or provide information, clarifications, etc.

The Rules are not also applied when the activity of the Operator indicated in the Complaint of the Claimant

is not regulated by special laws and is not supervised by the Bank of Lithuania and when the Operator is not responsible for performing the activity indicated in the Complaint of the Claimant.

6. You can find out more about the order of consumer disputes with the providers of financial providers of services in the website of the Bank of Lithuania: <https://www.lb.lt/lt/daugiau-apie-gincius-su-finansiniu-paslaugu-teikeju>.

II. SUBMISSION OF COMPLAINTS

7. The client, considering that the Operator inappropriately provides the services of the operator of the platform of crowdfunding or infringes the rights or legal interests of the Client, or if there are other valid reasons, has a right to lodge a Complaint to the Operator himself/herself or via a representative.

8. Customers or their representatives may submit a Complaint by attaching the Complaint as a separate scanned attachment to ensure text protection and to identify the signature by sending an email to info@inrento.com. The standard Complaint Form is attached as Annex 1 to the Rules.

9. The complaint must be submitted in Lithuanian or English (at the client's choice) and signed/certified by the Applicant. The Complaint must comply with the Complaint Form attached to these Rules.

10. The complaint must contain at least the following information:

10.1. Date of complaint;

10.2. Name of the applicant (in the case of an authorised person, also the name of the person represented and the grounds for representation);

10.3. Contact details of the applicant to receive a reply from the Operator;

10.4. The substance of the complaint, the action or inaction of the Operator;

10.5. The applicant claims;

10.6. a list of documents accompanying the complaint (documents supporting the substance of the complaint, visual representations of the problem, power of attorney, etc.)

11. If the Applicant is represented by another person, the Complaint shall be accompanied by the original power of attorney or a notarial copy or other document certifying the Applicant's representative's authority to act on behalf of the Applicant, and a notarised copy of the Applicant's representative's identity document, in the form prescribed by the law.

12. The operator does not analyse:

12.1. Complaint if an identical Complaint is already pending before another competent authority or a court, or if a decision of the Operator has been issued or a judgment, ruling or order of a court on the same subject matter and on the same grounds has entered into force. The Operator shall inform the Complainant thereof.

13. If the submitted Complaint does not comply with the requirements set out in this section of the Rules, the Operator may not examine the Complaint and shall notify the Complainant thereof, indicating the deficiencies of the Complaint to be remedied. A Complaint which is returned to the Complainant for rectification shall be deemed not to have been submitted to the Operator. The return of a Complaint to the Applicant shall not prevent the Applicant from reapplying to the Operator with an identical Complaint after the deficiencies have been corrected.

IV. THE REGISTRATION OF THE COMPLAINTS

14. The employee of the Operator, who accepts (receives) the Complaint on behalf of the Operator, is responsible for accepting and the primary registration of the Complaint in the record book. The employee of the Operator, having accepted (received) the Complaint, registers it in the record book of the Complaints.

15. The following data has to be present in the record book of the Complaints:

15.1. the date and method of receiving the Complaint;

- 15.2. registration number;
- 15.3. the name and surname or title of the Claimant;
- 15.4. the address of the Claimant indicated in the Complaint;
- 15.5. the essence of the Complaint (short contents);
- 15.6. the services or products of the Operator being appealed, their types;
- 15.7. the date of the submission of the reply to the Claimant;
- 15.8. the final result (decision) of solving the Complaint.

16. After registering the initial information about the received Complaint, the Operator's employee who receives the Complaint shall, on the same working day, hand over the Complaint and all the information related to the Complaint to the employee appointed by the Operator's manager, who is responsible for the examination of the Complaints and registration of the relevant follow-up data in the Complaints Registration Log.

17. Upon receipt of a Complaint, the Operator shall acknowledge receipt of such Complaint to the Customer and shall provide the following information: the name, surname, email address, telephone number of the person designated as the person responsible for the administration of the Complaint and to whom the Customer may submit any questions relating to the administration of the Complaint. The Company shall also provide an indication of when the Customer can expect to receive a response to the Complaint. All such information shall be provided to the Customer at the contact email address provided by the Customer.

V. SOLVING THE COMPLAINTS

18. The employee, appointed by the head of the Operator, is responsible for solving the Complaints. The Complaints are analysed following the general principles of rationality, honesty, justice, cost-effectiveness, cooperating with the Claimant and aiming to reach for as peaceful solution as possible.

19. If during the process of solving the Complaint the Claimant refuses his/her Complaint in writing, the employee analysing the Complaints cancels the initiated solving of the Complaint. In such case a certain entry is made in the record book of the Complaints about the refusal of the Complaint and the cancellation of the Complaint being solved.

20. Aiming to fully analyse the Complaint, besides, the employee appointed by the head of the Operator does the following:

- 20.1. collects and evaluates all the documents and data concerning the Complaint being solved;
- 20.2. analyses and evaluates the history data of the service of the Claimant;

20.3. analyses and evaluates the previous Complaints of the Claimant (if they were);

20.4. evaluates other accessible and other information significant for solving of the Complaint (agreements made by the Claimant, data concerning executing the obligations to the Operator, etc.);

20.5. if there is a need, communicates with the Claimant;

20.6. according to the need asks the employee of the Operator, whose actions are being appealed against, or the colleagues of the above-mentioned employee, to provide explanations regarding the circumstances of the Complaint;

20.7. noticing that additional explanations and (or) other written evidence is necessary for solving the Complaint, has a right to ask the Claimant or his/her representative to provide additional information.

21. A responsible employee of the Operator has to analyse the Complaint and give a detailed motivated answer, reasoned by documents to the Claimant as soon as possible, but no later than in 15 workdays from the day of receiving the Complaint of the Claimant. In exceptional cases, when there are reasons which cannot be controlled by the Operator, answer cannot be given in 15 workdays, the Operator sends a non-final reply indicating the reasons of the lateness of the reply to the Complaint and the term until which the Claimant will receive a final answer. In any case, the term of giving a final answer cannot exceed 35 workdays from the day of receiving the Complaint.

22. If the Complaint concerns the actions (inaction) of the employee responsible for solving the Complaints or his/her immediate family, working for the Operator, or the employees who are hierarchically above in the organizational structure of the Operator, or there are other circumstances which cause the conflict of interests, the employee of the Operator cannot refuse not to solve such Complaint and has to inform the head of the Operator about it. The head of the Operator has to appoint a new employee of the Operator to whom the interest of conflicts does not arise for solving a certain Complaint.

23. The Complaints are solved in writing. In exceptional cases the meeting of the parties can be organised aiming to peacefully settle the dispute. Meeting can be organized both by the Claimant and Operator.

24. The Complaint Officer shall inform the Complainant of the stage of the Complaint and of any additional measures taken to properly assess the Complaint. The Complaint Handler shall respond promptly to any questions raised by the Customer during the investigation of the Complaint.

25. The Complaints are solved free of charge.

26. The Operator stores the Complaints of the Claimants, as well as material concerning its solving, the document where the exact result of solving the Complaint is indicated and the reply

given to the Claimant no shorter than three years from the day of giving the final reply to the Claimant.

VI. GIVING REPLY

27. The original reply together with the documents attached are provided to the Claimant in his/her chosen method: sent by post or email.

28. At least the following has to be indicated in the reply to the Claimant:

28.1. the date of the reply;

28.2. motivated answer, if necessary – reasoned by documents;

28.3. the list of the documents attached (if there is such);

28.4 the name, surname, position and signature of the person who has prepared the reply to the Complaint.

29. In all cases the replies to the Complaints have to be harmonised with the head of the Operator.

30. If the Operator is not responsible for performing activity indicated in the Complaint, the Operator replies to the Claimant indicating the reasons of the refusal to accept and solve the Complaint, also, if it is possible, the participant of finance market responsible for solving his/her Complaint is indicated to the Claimant.

31. If the Complaint is not satisfied or partly satisfied, in the reply other measures of protecting the interests of the Claimant have to be indicated including but not restricting to the ones indicated in clauses 31 and 32 of the Rules.

32. If the Operator does not fulfil the requirements of the Claimant or they are partially fulfilled and the Claimant is a user, the Claimant has a right to address the Bank of Lithuania in writing or by email within 1 (one) year from addressing the Operator regarding the solution of the dispute having occurred. The Claimant, having missed the term of addressing the Bank of Lithuania, loses the right regarding the same dispute, i. e. regarding the same issue (requirement to the Operator) and on the same grounds (circumstances on which the requirement is based), address the Bank of Lithuania regardless the fact the he/she has repeatedly addressed the Operator.

33. If the Operator does not fulfil the requirements of the Claimant or they are partially fulfilled and the Claimant is not a user, the Claimant has a right to access to justice following order specified by the legislation of the Republic of Lithuania.

34. In all cases the reply is registered in the record book of the Complaints.

VII. THE EVALUATION OF THE RESULTS OF SOLVING DISPUTES

35. Aiming to identify its shortcomings and potential legal or operational risk, the Operator constantly evaluates the results of solving the Complaints. During this evaluation the employee appointed by the head of the Operator:

35.1. collects information about similar Complaints concerning certain service or product, performs the analysis of this information so that the essential reason of the occurrence of the Complaint could be identified, as well as suggests the priorities of eliminating the reasons to the head of the Operator;

35.2. evaluates if the essential reasons of the occurrence of certain Complaints can determine the occurrence of the Complaints due to other services or products;

35.3. evaluates if the essential reasons of the occurrence of certain Complaints can be eliminated and suggests the ways of their elimination to the head of the Operator;

35.4. if there is a need, eliminates the essential reasons of the occurrence of the Complaints;

35.5. ensures that the information about the repeated or systematic reasons of the occurrence of Complaints would be regularly submitted to the head of the Operator so that he/she could efficiently perform his/her functions.

36. The head of the Operator, having got acquainted with the information indicated in clause 34 of the Order about the Complaints received by the Operator and the results of their solving and having evaluated the suggestions received due to the priorities of the elimination of the reasons of Complaints and the methods of their elimination, takes certain decisions so that the identified essential reasons of the occurrence of Complaints would be eliminated.

37. The Operator stores the information about the decisions of the head of the Operator regarding the elimination of the shortcomings of the activity and risk management identified on the grounds of the Complaints no shorter than 3 years.

VIII. SOLVING THE DISPUTES BETWEEN THE PARTIES OF FUNDING TRANSACTION

38. If the Client of the Operator thinks that another party of the funding transaction has infringed their rights or legal interests regarding such infringement, the Client has to address the Operator due to such infringement following the same order as submitting the Complaint, but indicate that it is being addressed regarding the dispute between the parties of the funding transaction.

39. The Operator, having analysed the information provided by the Client concerning the dispute between the participants of the funding transaction can provide a suggestion to the parties regarding the possible way of solving the dispute. The suggestion provided by the Operator is not obliging or compulsory. In all cases the Operator obliges to reply the Client within the period no longer than 35 workdays.

40. In accordance with clause 37 of the Rules, the information provided by the Client is not considered to be the Complaint and correspondingly other provisions to be applied for the

Complaints specified in the Rules are not applied to it. Nevertheless, since the Operator provides services to both parties of the transaction, it is in the unique position for suggesting possible solutions for the disputes of the parties of the funding transaction. In all cases the Operator tries to act for the best interests of its Clients, but does not take any responsibility for the suggestion of the solution of the dispute, as well as its suitability or consequences.

41. Failing to solve the dispute between the parties of the funding transaction in accordance with the order specified in clauses 37 – 39 of the Rules, the dispute between the parties of the funding transaction is further being solved according to the order specified by legislation.

IX. FINAL PROVISIONS

42. The Operator stores and provides information at the request of the Bank of Lithuania about the number of the Complaints received, divided according to the reasons of submission and the results of solving (Complaints received, Complaints analysed, Complaints satisfied, partially satisfied Complaints).

43. The Rules, their amendments or additions enter into force after confirming them by the order of the Operator, if another date of the entering into force of the Rules, its amendments or additions is not indicated in it.

44. The employee appointed by the head of the Operator is responsible for the appropriate implementation of these Rules, who shall also observe that the process of the management of the Complaints of the Operator would be efficient, and if there is a need – it would be renewed, including the renewal of these Rules, as well as the shortcomings noticed shall be corrected.

45. All the employees are acquainted with have to follow these Rules and their amendments while signing.

ANNEX TO THE RULES NO. 1 SHORT FORM

ANNEX

Standard complaints form

LODGING A COMPLAINT

(to be sent by the client to the crowdfunding provider)

1.a Personal data of the complainant:

SURNAME/NAME OF LEGAL ENTITY	NAME	REGISTRATION NUMBER AND LEI (IF ANY)
[...]	[...]	[...]

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POST CODE	CITY	SIDE
[...]	[...]	[...]	[...]

PHONE	[...]	E. EMAIL	[...]
[...]	[...]	[...]	[...]

1.b. Contact details (if different from those in 1.a):

SURNAME/NAME OF THE LEGAL ENTITY	NAME
[...]	[...]

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POST CODE	CITY	SIDE
[...]	[...]	[...]	[...]

[...]	[...]	[...]	[...]
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PHONE	[...]	E. EMAIL	[...]
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2.a. Personal details of the legal representative (if applicable) (power of attorney or other official document proving the appointment of the representative):

NAME	NAME OF THE LEGAL ENTITY	REGISTRATION NUMBER AND LEI (IF ANY)
[...]	[...]	[...]

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POST CODE	CITY	SIDE
[...]	[...]	[...]	[...]

PHONE	[...]	E. EMAIL	[...]
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2.b. Contact details (if different from those in 2.a):

SURNAME/NAME OF THE LEGAL ENTITY	NAME
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[...]	[...]
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ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POST CODE	CITY	SIDE
[...]	[...]	[...]	[...]

PHONE	[...]	E. EMAIL	[...]
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3. Information about the complaint

3.a Full reference to the investment or arrangement to which the complaint relates (i.e. registration number of the investment, name of the project owner/company or the crowdfunding project, other references to the relevant transactions...)

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3.b. Description of the subject matter of the complaint (clearly state the subject matter of the complaint)

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Please provide supporting documentation for these facts.

3.c. Date(s) of the facts complained of

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3.d. Description of the damage or loss caused (where relevant)

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3.e Other comments or relevant information (where relevant)

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Location	Date
[...]	[...]
SIGNATURE	

COMPLAINANT/LEGAL REPRESENTATIVE	
Documents submitted (tick the appropriate box):	
The mandate or other relevant document ...	<input type="checkbox"/>
A copy of the contract documents for the investment complained of ...	<input type="checkbox"/>
Other documents in support of the complaint:	<input type="checkbox"/>

**ANNEX TO THE RULES NO. 2
COMPLAINTS LOGBOOK**

COMPLAINTS LOGBOOK	
NO.	[...]
DATE OF RECEIPT OF THE COMPLAINT	[...]
CLIENT'S NAME / SURNAME / TITLE	[...]
DESCRIPTION OF THE COMPLAINT	[...]
THE SERVICES OR PRODUCTS COMPLAINED OF, AND THEIR TYPES	[...]
HOW THE COMPLAINT WAS HANDLED (WHEN IT WAS HANDLED, BY WHOM, ETC.)	[...]
DATE OF RESPONSE	[...]
OUTCOME/DECISION	[...]
NOTES	[...]