

Funderbeam Complaints Handling Policy

Approved by the board of Funderbeam Markets AS and Funderbeam Markets LTD at a meeting of the management board in September 2021

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1. Purpose And Scope

This Complaints Handling Policy (the “Policy”) outlines the way in which we handle complaints made against Funderbeam, our product, processes or staff.

This Policy shall apply to the handling and reporting of client complaints arising in the provision of services by or on behalf of Funderbeam Markets AS (“Funderbeam AS”) and Funderbeam Markets Ltd (“Funderbeam Ltd”) and (collectively “Funderbeam”). If applicable law prescribes differently then Funderbeam AS and Funderbeam Ltd complaints handling is described accordingly.

The Policy will apply to any group tied agent or group service company providing services for or on behalf of Funderbeam. The Policy will also apply to any complaints related to information prepared or disclosed by other Funderbeam Group entities in accordance with Regulation (EU) No 1286/2014 of the European Parliament and of the Council of 26 November 2014 on key information documents for packaged retail and insurance-based investment products (PRIIPs) and Guidelines on complaints-handling for the securities and banking sectors JC 2018 35. For purposes of Funderbeam Ltd UK FCA rules are applicable.

Funderbeam is committed to addressing the needs and concerns of our clients. This requires complaints (and criticisms which do not amount to complaints) to be dealt with promptly and courteously.

If you have any questions or suggestions about this Complaints Handling Policy or have any complaint-related queries, please contact complaints@funderbeam.com.

2. What Is A Complaint For The Purposes Of This Policy?

With a view to grasp a wide range of critical communication with clients and to follow expectations by supervisory authorities, we have defined the complaint as follows:

"An expression of dissatisfaction made to an organisation by a natural or legal person, related to its products and services, or the complaints handling process

itself, where a response or resolution is explicitly or implicitly expected and/or that claims that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience".

Funderbeam's policy is to take all complaints seriously, whether in writing, in person or on the telephone. A complaint may be in written or verbal format, however we encourage clients to put their complaints in writing so as to be clear and unambiguous.

Occasionally, Funderbeam receives negative feedback, which we believe would not require a resolution or formal follow-up. Please note that this type of feedback is valuable to Funderbeam, however, this Policy does not apply to feedback of this nature and this feedback is not considered as complaint

"Complaints" do not include queries that can be answered to the full satisfaction of the client and Funderbeam on the same day. "Complaints" can include queries where the client seems dissatisfied with the information Funderbeam is able to provide within a reasonable time scale.

3. Who Is A Complainant?

Any person or organisation that is dissatisfied with our product or a service we provide, may contact Funderbeam to complain. A complainant for the purposes of this Policy is a Funderbeam client. This Policy does not cover complaints made by persons or organisations that are not Funderbeam clients.

In the event that we receive a complaint from a client that is not a Funderbeam client, we will follow normal support function protocol and redirect that individual to the entity or intermediary against whom the client has made a complaint.

4. How To Complain

Complainants should email complaints@funderbeam.com to lodge a complaint.

5. Principles

It is important to handle customer complaints, however trivial or unjustified, with diligence and care. The reasons for doing so are as follows:

- Funderbeam must treat customers fairly and must analyse whether a complaint indicates a failure to meet regulatory rules, including principles for business - : “a firm must pay due regard to the interests of its customers and treat them fairly”;
- It is a regulatory obligation for Funderbeam to handle any complaint properly, particularly those relevant to Funderbeam's compliance with the regulatory system;
- The breach of any regulatory requirement can lead to disciplinary action against Funderbeam. The range of penalties includes fines, restriction of business, suspension and expulsion;
- Under the general law Funderbeam could be open to claims for misrepresentation, deceit, breach of contract, tort or breach of fiduciary duty.

6. Acknowledging And Handling The Complaint

Funderbeam will send a written acknowledgement within as soon as possible, but not later than five (5) business days, if Funderbeam is not able to deal with the complaint fully, outlining that we have received the complaint and are investigating the complainant's issue.

Complaints will be handled by the Compliance Officer in cooperation with the respective business area manager.

Funderbeam Markets replies to the complainant with a response within fifteen (15) days from the receipt of the complaint with redress or compensation, as applicable or potential solution to the complaint.

The final response will either:

1. accept the complaint and where appropriate, offer redress or remedial action;

2. offer redress or remedial action without accepting the complaint; or
3. explain Funderbeam's position in the event that we reject the complaint and give reasons for doing so.

If we are unable to resolve a complaint within 15 days, Funderbeam will reply to the complainant with a written response (holding letter), which explains:

- why we have not yet been able to provide a final response
- advising the complainant where it has got to with its investigation
- when a final response will be provided

Written response to complainant will also include details of any option for the complainant to address the matter with the dispute resolution entity.

For Funderbeam AS dispute resolution entity is Estonian Consumer Protection and Technical Regulatory Authority (www.ttja.ee) or the Estonian Financial Supervision Authority (www.fi.ee). Furthermore, in order to resolve a dispute, a client may contact the Consumer Disputes Committee operating at the Consumer Protection Authority and Technical Regulatory or turn to court. A complaint to the Consumer Dispute Committee can be submitted also digitally via Online Dispute Resolution website at <http://ec.europa.eu/odr>. The rules of procedure of the committee are available at www.komisjon.ee.

For Funderbeam Ltd dispute resolution authority is UK Financial Ombudsman <https://www.financial-ombudsman.org.uk>. Complainant may take civil action, if it chooses so.

If the complainant doesn't respond to the final response, Funderbeam will consider the complaint closed.

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7. Assessing The Complaint

Funderbeam investigates a complaint promptly and fully by an employee of sufficient competence, who was not involved in the matter giving rise to the complaint.

All Funderbeam's internal investigations will be overseen by the Compliance Officer. The Compliance Officer should commence and conduct the investigation without delay. The Compliance Officer may allocate the investigation of the complaint to a member of Funderbeam's support team.

The purposes of an internal investigation are to:

- assess fairly whether Funderbeam should settle or resist the claim;
- prepare for litigation by the customer; and
- identify any changes to systems and procedures which may be necessary.

The Compliance Officer can insist on the co-operation of any employee or access to any papers. Those conducting an investigation have the same right of access to information across the Funderbeam group.

The process that will be followed to investigate will be broadly as follows:

- (1) Review the completeness and accuracy of the information.
- (2) Review the documentation and information relating to the case.
- (3) Review the relevant data stored in Funderbeam's systems.

8. Record Of Complaints & Training

Funderbeam The Compliance Officer will maintain a record of any complaint received in the complaints register. Funderbeam employees with roles that require detailed knowledge of the complaints handling undergo regular compliance training to ensure awareness of our complaints handling obligations.

9. Reporting

Complaints are reported by Funderbeam AS to Estonian FSA using the Eesti Pank reporting system and by Funderbeam Ltd to the FCA, using the GABRIEL system. a quarterly basis, or as otherwise required.