

2017.03.31.

ERSTE BANK HUNGARY ZRT.

COMPLAINT MANAGEMENT POLICY

2017.03.21.

Dear Customer,

First, we thank you for choosing **ERSTE Bank** to manage your financial matters!

Our primary aim is to form and develop our products and services in the way that they meet your needs. Therefore, your complaints and observations have an important role in our endeavor to do this, since they help us to improve and develop the quality of our services. If you, despite our efforts, have an objection, we inform you below about the ways of submitting a complaint and the main points of the Bank's complaint management.

I. COMPLAINT SUBMISSION METHODS

You can submit your complaint to our Bank in the following ways:

- Personally – in words or in writing – at any branch of the Bank during business hours. *Corporate customers* can also submit complaints to the contact persons or administrators of trading centers in a predetermined point of time.
A third person can also hand over your complaint to one of our administrators, if you described and duly signed the complaint and the signature corresponds to that on the specimen signature card.

Exact addresses and business hours of the branches are available on the Bank's official website: (www.erstebank.hu). You can contact the Bank in the following ways:

- Over the phone on Telebank call-numbers around the clock
 - *retail and micro-company customers*: via retail TeleBank on +361 298 0222 in Hungary and from abroad,
 - *corporate customers*: via corporate TeleBank on +361 298 0223 in Hungary and from abroad.

Customer calls to the Bank will be answered by an operator within 5 minutes and complaints can be reported from 8 to 16 on business days and from 8 to 20 on one business day per week (extended business day). In case the regular extended business day is on a national holiday, the actual extended business day shall be the first business day of the week concerned.

We call your attention to the fact that if the complaint is managed over the phone, the conversation is recorded and the voice recording is retained for 5 years.

- In writing by post to the following address:
 - *retail and micro-company customers*: ERSTE BANK HUNGARY ZRT. Central Customers Service Department, 1138 Budapest Népfürdő u. 24-26.
 - *corporate customers*: ERSTE BANK HUNGARY ZRT. Corporate Complaint Management, 1138 Budapest Népfürdő u. 24-26.
- By fax:
 - *retail and micro-company customers*: to fax number +36-1-219-4784;
 - *corporate customers*: to fax number +36-1-219-4766.
- By e-mail to the Bank's e-mail address: erste@erstebank.hu. In the interest of the customers' security, the Bank can only send general answer in e-mail that does not contain banking secret; therefore, the Bank sends its written answer (that may contain banking secret) to your mailing address, if your complaint was submitted via e-mail.

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- In case you are entitled to use any of the electronic banking services (Erste NetBank, Erste MobilBank, Erste Elektra, Erste Multicash), you may send your complaint to the Bank in electronic letter through the electronic banking system belonging to the specific electronic service. The Bank sends written answer to *retail customers* through the same electronic banking system. In the case of *corporate customers*, the Bank mails the answer to the customer's mailing address.

Complaint can be submitted through another authorized person. The authorization should be drawn up in the form of an authentic instrument or private document with conclusive force as set out in Act III of 1952 on the Code of Civil Procedure, or in the form of letter of attorney.

II. INVESTIGATION OF THE COMPLAINT

Is the investigation of the complaint free of charge?

Investigation of the complaint is free of charge, that is, no separate fee can be charged for it.

How is your complaint managed?

The Bank investigates the complaint with the consideration of all relevant circumstances in user friendly way.

- Complaints submitted verbally, either in person or over the phone, are investigated and, if possible, resolved by the Bank immediately.
- Voice recording of the complaint submitted over the phone are retained for five years. You are enabled to listen to the recorded conversation and the Bank makes its official transcript available to you within 15 days free of charge.
- If the immediate complaint investigation is not possible, or you disagree with the way the complaint is managed and with the Bank's positions regarding the issue, the branch administrator draws up a report of the complaint and – if the complaint was presented in person – a copy of the minutes will be handed over to you. If the verbal complaint is submitted over the phone, the copy of the minutes will be sent to you along with the answer to the complaint.

The report serves to record the following:

- a) your name;
- b) your address, seat and notification address, if necessary;
- c) place, time and method of the complaint submission;
- d) detailed description of complaint, stating separately each objection contained in the complaint so that all such objections are investigated in full;
- e) client number, contract number that the complaint relates to;
- f) list of documents, papers and other evidences presented by you;
- g) your signature and that of the person drafted the minutes, if the immediate investigation of the complaint is not possible;
- h) place and date of drafting the minutes;
- i) name and address of the Bank;
- j) identification number of the complaint.

Where is the complaint investigated?

Complaints that cannot be investigated on the spot (in bank branch, over the phone) and the complaints of *retail customers* submitted in writing are sent to the Central Customer Service and Complaint Management Department. Complaints of *corporate customers* are sent to the

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Corporate Complaint Management Department to investigate, resolve, and settle the problems as soon as possible. These complaint management organizations can be contacted in writing using their mailing addresses specified above.

When do you get answer to your complaint with which content?

In case of complaint recorded or submitted in writing, the Bank sends a written answer to you within 30 calendar days after complaint submission. Exceptions are the complaints that relate to bankcards, since the rules of international card companies apply to these cases and the complaint management takes longer time (max. 150 days). You will be informed about this fact within 30 days asking your patience until the investigation is closed. General questions about our products and services, as well as information on data changes, requests for equity and other applications cannot be considered as complaints.

In our answer we inform you on the result of the investigation, the Bank's position, the reason for it, the actions to be taken and the possibilities of legal remedy and conciliation.

III. DATA REQUIRED FOR COMPLAINT MANAGEMENT

Which data can we ask for in particular during complaint management?

- a) your name;
- b) contract number, client number;
- c) address, seat and notification address;
- d) phone number;
- e) preferred notification method;
- f) product or service that the complaint relates to;
- g) reason and description of the complaint;
- h) demand of complaint;
- i) copy of documents in the customer's possession necessary for supporting the complaint;
- j) valid authorization letter, if the customer acts via an authorized representative, particularly in the case of authorization letter containing the data listed above in a) b) c) f) g) and h) points;
- k) other data necessary for investigating and answering the complaint.

For lack of data suitable for identification, only general information can be given to you or to the person authorized by you that does not contain banking secret, security secret and personal data.

The Bank handles your data in compliance with Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information

IV. THE BANK'S INFORMING OBLIGATION REGARDING COMPLAINT MANAGEMENT

Possible remedies in case you disagree with our answer.

Our primary aim is that we close the complaint in a manner satisfactory for both parties. Therefore, we ask you to contact first the Customer Service Department of Erste Bank Hungary Zrt. dealing with complaint management, if you think that our answer is inadequate or unsatisfactory.

If the complaint is rejected or the 30-day legal deadline for investigating the complaint is passed, you can turn to the following bodies and authorities:

Consumer: (consumer is a natural person who acts in a matter that falls outside its profession and economic activity):

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In the case of complaint that does not qualify as individual legal dispute (that is connected with the violation of consumer protection rules set out in Act CXXXIX of 2013 on the National Bank of Hungary), you can turn to the **Financial Consumer Protection Centre of the National Bank of Hungary** (mailing address: National Bank of Hungary 1534 BKKP Pf. 777; phone number: 06-80-203-776; e-mail address: ugyfelszolgalat@mbn.hu).

In the case of individual legal dispute (if the complaint is connected with contract conclusion, validity, legal impacts and termination of the contract concluded between the Bank and the customer or with contract violation and the legal impacts thereof)

- a) you can turn to the **Financial Arbitration Board**, an independent body operated by NBH /National Bank of Hungary/ and initiate proceedings (mailing address: National Bank of Hungary 1525 Budapest BKKP Pf. 172; phone: 06-80-203-776; e-mail address: ugyfelszolgalat@mbn.hu), or
- b) you can institute an action at the **Court** in charge of the region.

In the case of rejection of the complaint or the expiry without result of the 30-day statutory response deadline, the Bank, upon request, sends the printed forms (financial consumer protection application) free of charge to you that are necessary to institute an action at the Financial Arbitration Board or the Financial Consumer Protection Centre of the National Bank of Hungary. We inform you that our company made no declaration of general submission with the Financial Arbitration Board. :

The Bank sends you the forms electronically free of charge, if you have documented electronic access right. If not, the Bank sends them to you by mail immediately.

If your complaint related to data protection, you can turn to the Court in charge of your domicile or dwelling place or to the Hungarian National Authority for Data Protection and Freedom of Information.

In the case of customer not classified as consumer:

In the case of individual legal dispute (if the complaint is connected with contract conclusion, validity, legal impacts and termination of the contract concluded between the Bank and the customer or with contract violation and the legal impacts thereof)

you can institute an action at the Court in charge of the region.

V. COMPLAINT REGISTRATION

What kind of record is kept by the Bank on complaints?

The Bank keeps electronic record on customer complaints and on the actions taken to resolve the problems that make it possible to

- a. group the complaints according to their subject
- b. reveal and identify the facts and events that formed reason for the complaint,
- c. investigate, whether the facts and events in point b. can have impact on other procedure, product or service
- d. take action to correct the facts and events listed in point b.,
- e. summarize the recurring or system-level problems and the legal risks.

The Bank keeps the complaint and the responses for five years. .

VI. COMPLAINTS RELATED TO MORTGAGE LOAN INTERMEDIATION ACTIVITY

The Bank handles the complaints related to mortgage loan intermediation activity in accordance with this policy, considering the differences described in section VI.

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In addition to the channels specified in the complaint management policy of Erste Lakástakarék Zrt./Erste Lakáslízing Zrt. (Erste Housing Savings Fund Co. Ltd./Erste Flat Leasing Ltd.), complaints can be submitted through the above-mentioned channels of Erste Bank Hungary Zrt. The Bank registers the complaints received in this way in the independent and physically separated complaint management system of ERSTE Lakástakarék./Erste Lakáslízing. and forwards them immediately to Erste Lakástakarék/Erste Lakáslízing. Minutes on the complaint is taken on the basis of the complaint management policy of ERSTE Lakástakarék/Erste Lakáslízing; this does not contain regulation that differs from that in Bank's complaint management policy in this respect. The complaints are investigated in compliance with the effective complaint management policy of Erste Lakástakarék/Erste Lakáslízing.

The reporting date of the complaint is the first date when the complaint arrives through any of the channels at the Bank or Erste Lakástakarék/Erste Lakáslízing. If the complaint was registered at any channel of the Bank and forwarded to ERSTE Lakástakarék/Erste Lakáslízing, the time of registration and not the time of forwarding/arrival at ERSTE Lakástakarék/Erste Lakáslízing is the time of reporting the complaint.

Complaints that fall under the scope of this point and come to the Bank will be registered in the independent and physically separated complaint management system of ERSTE Lakástakarék /Erste Lakáslízing with data content specified in the independent complaint management policy of ERSTE Lakástakarék/Erste Lakáslízing and expected by law. Complaint management policy of ERSTE Lakástakarék can be found on the company's website:

http://www.erstebank.hu/static/internet/download/LTP_Panaszkezelesi_szabalyzat_20170127.pdf.

Complaint management policy of Erste Lakáslízing Zrt. can be found on the website of Erste Lakáslízing:

http://www.erstebank.hu/static/internet/download/ell_panaszkezelesi_szabalyzat_20160915.pdf

The Bank issued this Complaint Management Policy in accordance with the provisions in Section 288 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises and in the Decree No. 28/2014. (VII.23.) MNB of the Governor of the National Bank of Hungary on the Complaint Management of Financial Institutions. The Bank's Complaint Management Policy is available on the Bank's official website (www.erstebank.hu), and is displayed at all branches of the Bank.

Thank you that you have read the Bank's Complaint Management Policy.

Regards

ERSTE BANK HUNGARY ZRT.