

Na osnovu člana 26. Statuta API Bank a.d. Beograd i članom 12. Pravilnika o organizacionim zahtevima za pružanje investicionih usluga i obavljanje investicionih aktivnosti i dodatnih usluga („Službeni glasnik RS“ br. 89/2011, 44/2012, 94/2013 и 3/2016) Izvršni odbor API Bank a.d. Beograd – u daljem tekstu “Banka” na sednici održanoj dana 08.08.2019. godine donosi

PRAVILNIK O NAČINU REŠAVANJA PRITUŽBI KLIJENATA OVLAŠĆENE BANKE API BANK A.D BEOGRAD

1. OPŠTE ODREDBE

Ovim Pravilnikom utvrđuje se interni postupak koji primenjuje API Bank a.d. Beograd za rešavanje pritužbi klijenata koje mogu nastati prilikom pružanja investicionih i dodatnih usluga – u daljem tekstu “investicione usluge”.

Pravilnik se primenjuje u Sektoru sredstava i likvidnosti – Odeljenje za brokerske poslove – u daljem tekstu “Ovlašćena banka”.

2. NAČELA REŠAVANJA PRITUŽBI KLIJENATA

Interni postupak za rešavanje pritužbi klijenata sprovodi se na načelima:

- 1) Jednak pristup pritužbama svakog klijenta;
- 2) Brzo i efikasno rešavanje pritužbi po redosledu primanja;
- 3) Rešavanja u skladu sa Zakonom i podzakonskim aktima, Pravilima poslovanja Ovlašćene banke, zaključenim ugovorima o pružanju investicionih usluga i dobrim poslovnim običajima;

Based on Article 26 of the Statute of API Bank a.d. Beograd and Articles 12 of the Rulebook on organizational requirements for the provision of investment services and performance of investment activities and ancillary services (Official Gazette of RS, 89/2011, 44/2012, 94/2013 and 3/2016), on 8th August 2019., the Executive Board of API Bank a.d. Beograd, adopts

THE RULEBOOK FOR DEALING WITH CLIENT COMPLAINTS

1. GENERAL PROVISIONS

By this Rulebook establishes an internal procedure applied by API Bank a.d. Belgrade for resolving client complaints, that may arise by providing investments and additional services - hereinafter referred to as "investment services".

The Rulebook shall apply in Sector - Assets and Liabilities Management Service (ALM) - Brokerage department - hereinafter referred to as the Authorized Bank.

2. PRINCIPLES OF SOLVING CLIENT COMPLAINTS

The internal procedure for resolving client complaints is conducted on the following principles:

- 1) Equal access to each client's complaints;
- 2) Fast and efficient resolution of complaints in the order of receipt;
- 3) Decisions in accordance with the Law and By-Laws, Rules of operations of the Authorized Bank, concluded Investment services Agreement and good business practices;

3. PRAVO NA PRITUŽBU

Postupak za rešavanje pritužbi klijenata se sprovodi kada klijent nije zadovoljan:

- 1) Postupanjem Ovlašćene banke ili zaposlenih u Ovlašćenoj banci;
- 2) Dokumentima izdatim od strane Ovlašćene banke;
- 3) Pruženim investicionim uslugama od strane Ovlašćene banke;

4. SADRŽAJ PRITUŽBE

Klijent podnosi u pisanoj formi pritužbu, koja treba da sadrži sledeće elemente:

- 1) Ime, prezime i adresa prebivališta, odnosno boravišta klijenta, zakonskog zastupnika ili punomoćnika klijenta;
- 2) Matični broj klijenta, zakonskog zastupnika ili punomoćnika klijenta;
- 3) Opis i obrazloženje osnova pritužbe, zahtev za otklanjanje povrede ili odštetni zahtev;
- 4) Dokumentaciju kao dokaz za potvrdu činjenica na koje je upućena pritužba;
- 5) Potpis klijenta, zakonskog zastupnika ili punomoćnika klijenta koji podnosi pritužbu;
- 6) Datum podnošenja pritužbe;

U izuzetnim slučajevima, klijent pritužbu može izneti i lično ili telefonom, a zatim u roku od 7 (sedam) dana istu potvrditi i u pisanoj formi. Ukoliko se pritužba ne potvrdi u pisanoj formi, smatra se da nije ni data.

5. NAČIN PODNOŠENJA PRITUŽBE

Pritužbe u pisanoj formi se mogu dostavljati:

- 1) Lično u prostorijama Banke;
- 2) Elektronski - na email adresu : info_brokers@apibank.rs;
- 3) Poštom - na adresu Balkanska 2, 11000 Beograd, sa naznakom

3. RIGHT TO COMPLAINTS

The procedure for resolving client complaints is carried out when the client is not satisfied:

- 1) By acting of the Authorized Bank or employees of the Authorized Bank;
- 2) Documents issued by the Authorized Bank;
- 3) Investment services provided by the Authorized Bank;

4. CONTENTS OF THE COMPLAINTS

The client submits a written complaint, which should include the following elements:

- 1) Name, surname and address of the client's residence, legal representative or attorney;
- 2) Client's personal identification number, legal representative or attorney;
- 3) Description and reasoning for the complaint, request for removing the violation, or compensation claim;
- 4) Documentation as evidence for confirming the facts complained of;
- 5) Signature of the client, legal representative or attorney of the client, who submits the complaint;
- 6) Date of submitting of complaint;

In exceptional cases, the client may file the complaint either in person or by telephone, and then within 7 (seven) days confirm the complaint in writing. Unless the complaint is confirmed in writing, it is not considered to have been given.

5. WAY OF SUBMITTING THE COMPLAINTS

Complaints in writing may be submitted:

- 1) In person at the premises of the Bank;
- 2) Electronic - to the email address: info_brokers@apibank.rs;

“Pritužba klijenata - Odeljenje za brokerske poslove” ;

Uredno primljena pritužba zavodi se prema hronološkom redosledu prijema pritužbi.

6. LICE NADLEŽNO ZA REŠAVANJE PRITUŽBI

Interni Kontrolor je ovlašćeno lice koje je nadležno za rešavanje pritužbi i koje:

- 1) prima i proverava pritužbu sa priložima;
- 2) pristupa rešavanju pritužbi, ocenjuje osnovanost pritužbe i priprema nacrt odgovora;
- 3) nacrt odgovora šalje Rukovodiocu svoje organizacione jedinice, Sektoru pravnih poslova, Službi kontrole usklađenosti poslovanja i Izvršnom odboru;
- 4) nakon dobijanja mišljenja, i eventualne korekcije, pisani odgovor potpisuje Rukovodilac službe nadležne za rešavanje pritužbi i Direktor sektora pravnih poslova;
- 5) obezbeđuje slanje odgovora klijentu najkasnije u roku od 15 dana od dana prijema pritužbe (preporučenom poštom sa povratnicom). Ukoliko postoje razlozi koji ne zavise od Banke, rok za odgovor se može produžiti za najviše 15 dana;
- 6) Informacije o konacnom odgovoru, datumu, vremenu i načinu dostavljanja odgovora klijentu prosleđuje Službi za kontrolu usklađenosti poslovanja, kao i kopiju dokaza o prijemu odgovora.

Ukoliko interni kontrolor utvrdi da je pritužba osnovana, pristupa rešavanju pritužbi, ukoliko utvrdi da pritužba nije osnovana, tj. da je pritužba rezultat neznanja ili trenutne ishitrene reakcije klijenata, potrebno je stupiti u kontakt sa klijentom i u razgovoru navesti klijenta da uvidi neosnovanost svoje pritužbe i da se na taj način spreči nepotrebno formiranje i procesuiranje novog predmeta/pritužbe, a istovremeno zadovolji klijent.

3) By mail - to the address Balkanska 2, 11000 Belgrade, with a note

“Client Complaint - Brokerage Department”;

The duly received complaint is recorded in chronological order of receipt of the complaint.

6. PERSON IN CHARGE OF DEALING WITH COMPLAINTS

The Internal Controller is an authorized person responsible for resolving complaints and who:

- 1) receives and checks the complaint with the attachments;
- 2) approach to resolving of complaints, evaluate the merits of the complaint and prepare a draft response;
- 3) send the draft response to the Head of organizational unit, the Legal Sector, the Compliance Department and the Executive Board;
- 4) upon receipt of the opinion, and any correction, the written response shall be signed by the Head of the Complaints Department and the Director of the Legal Affairs Sector;
- 5) ensure that the response is sent to the client no later than 15 days from the day of receipt of the complaint (by registered mail with return receipt). If there are reasons beyond the control of the Bank, the response deadline may be extended by up to 15 days;
- 6) Forward the information on the final answer, date, time and manner of submitting the response to the client, to the Compliance Department, as well as a copy of the proof of receipt of the response.

If the internal controller determines that the complaint is well-founded, it shall proceed to resolve the complaints, if it determines that the complaint is not founded, ie. that the complaint is the result of ignorance or immediate overt reaction of the clients, it is necessary to contact the client and in the conversation try to indicate that the client understand the baselessness of the complaint and thus prevent unnecessary formation and processing of a new case /

Ukoliko klijent nije zadovoljan konačnim odgovorom ili odgovor na pritužbu nije ni dobio, može se obratiti Komisiji za hartije od vrednosti – regulator tržišta kapitala u Republici Srbiji, putem sajta www.sec.gov.rs

7. ČUVANJE DOKUMENTACIJE

Originalna dokumentacija pojedinačnog slučaja pritužbe čuva se u organizacionoj jedinici nadležnoj za rešavanje pritužbi, a kopija Službi kontrole usklađenosti poslovanja.

Dosijeji se čuvaju u organizacionoj jedinici nadležnoj za rešavanje pritužbi pet (5) godina.

8. ZAVRŠNE ODREDBE

Ovaj pravilnik je sastavni deo Pravila poslovanja Ovlašćene banke, na koje Komisija za hartije od vrednosti daje saglasnost.

Po dobijanju saglasnosti na Pravila poslovanja Ovlašćene banke, Pravilnik se objavljuje na internet adresi Banke : www.apibank.rs i u poslovnim prostorijama Banke u kojima se pružaju investicione usluge.

complaint, and at the same time to satisfy the client.

If the client is not satisfied with the final answer or has not received the answer at all, he can contact the Securities and Exchange Commission - Capital Market Regulator in the Republic of Serbia through the website www.sec.gov.rs.

7. KEEPING OF THE DOCUMENTATION

The original documentation of the individual complaint case is kept in the organizational unit responsible for handling complaints, and a copy in the Compliance Office.

The files are kept in an organizational unit responsible for handling complaints for five (5) years.

8. CLOSING PROVISIONS

This Rulebook is an integral part of the Rules of operations of the Authorized Bank, to which the Securities Commission gives its consent.

Upon obtaining approval of the Rules of operations of the Authorized Bank, the Rulebook shall be published on the Bank's Internet site: www.apibank.rs and in the Bank's premises where investment services are provided.

API Bank a.d. Beograd

PREDSEDNIK IZVRŠNOG ODBORA

PRESIDENT OF THE EXECUTIVE BOARD

Marija Stepina

ČLAN IZVRŠNOG ODBORA

MEMBER OF THE EXECUTIVE BOARD

Valentina Keiša

ČLAN IZVRŠNOG ODBORA

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