Updated agreement came into force: 02 April 2026

THE RULES FOR THE RECEIPT AND PROCESSING OF CLIENT CLAIMS (COMPLAINTS) OF PAYSERA LT, UAB

CHAPTER I

GENERAL PROVISIONS

1. The purpose of the Rules for the Receipt and Processing of Client Claims (Complaints) of Paysera LT, UAB (hereinafter referred to as the Rules) is to ensure the high quality of client support at Paysera LT, UAB (hereinafter referred to as the Company) by effectively processing client claims (complaints) and resolving related issues.

2. The Rules shall apply to all claims (complaints) received in relation to client support and shall cover the quality and control of claims (complaints) resolution.

3. The Client Support Department and other responsible employees of the Company involved in the processing and resolution of the claim (complaint) must be familiarised with and follow the Rules.

4. The terms used in the Rules shall have the following meanings:

4.1. **Response** shall mean a written reply provided to the client addressing the raised issues and/or requirements.

4.2. **Company** shall mean Paysera LT, UAB (legal entity code 300060819, VAT payer's code LT10001261114, registered office at Pilaitės pr. 16, Vilnius, the Republic of Lithuania).

4.3. **Client** shall mean a natural person or legal entity registered in the Company's system and having created an account.

4.4. **Claim (complaint)** shall mean a written appeal submitted by the claimant to the Company stating that the rights and/or legitimate interests of a person have been violated in connection with, or arising from, the services provided by the Company or the concluded contracts.

4.5. **Claims (Complaints) Registration Log** shall mean a log where claims (complaints) received directly from clients by mail, email, or other electronic means are registered. This registration log shall be maintained electronically and published on the Company's Intranet.

4.6. **Inquiry** shall mean an enquiry or request made by the client, either orally or in writing, in relation to the services or support provided by the Company, where the resolution of the inquiry or request is uncomplicated, and the answer can be provided immediately or the matter can be resolved in the course of the contact with the client.

4.7. **Consumer** shall mean a natural (private) person using the Company services for purposes unrelated to their business, trade, or professional activity.

4.8. **Partner** – a third party (natural or legal person) engaged by the Company in providing Services to Clients or distributing its products. This term includes Intermediaries, electronic money distributors, and other entities acting on a partnership basis, through whose administered platforms, websites or mobile applications Clients are granted access to the Company's Services.

4.9. The Company assumes responsibility for handling Complaints related to the actions of the Company's Partners (intermediaries) in the provision of the Company's services. Partners must immediately, but no later than within 1 business day, forward any received Complaints to the Company. The Company ensures that Partners comply with the requirements of these Rules.

CHAPTER II

REGISTRATION OF CLIENT INQUIRIES AND CLAIMS (COMPLAINTS)

5. The Client has the right to submit a Complaint to the Company no later than within three months from the moment they became aware or should have become aware of the infringement that may be related to their rights or legitimate interests.

6. The Client may submit an inquiry in writing (by sending an email to support@paysera.com or by mail to Pilaitės pr. 16, Vilnius), orally (by telephone), or in person at the Client Support Department at Pilaitės pr. 16, Vilnius.

6.1. If a Complaint is received via a Partner (Intermediary), the responsible employee must immediately register it in the Complaints (Claims) Register (in the Intranet). The actual request and correspondence may be handled in the (Zammad) system. When registering, it must be indicated that the Complaint was received via an Intermediary, and all documents and initial explanations forwarded by the Intermediary must be attached.

7. Claimants may submit Complaints in Lithuanian or in another language if so agreed with the Company in the contract. Complaints are accepted and handled free of charge.

8. Client inquiries made verbally (by phone or at the Client Support Department) shall be answered and the information they need shall be provided during the conversation. If an immediate answer and information cannot be provided for an oral inquiry, the employee of the Client Support Department shall ask the client to submit the inquiry in writing.

9. Upon receiving a written client inquiry, the employee of the Client Support Department must independently or with the assistance of employees from other departments organise and ensure the provision of a high-quality and comprehensive answer (information) to the client.

10. If a written inquiry meets the criteria of a claim (complaint), the employee of the Client Support Department helping the client shall mark it as a claim (complaint) in the Zammad system and, no later than the next business day, shall forward it to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, who shall register the claim (complaint) in the Claims (Complaints) Registration Log.

11. Clients who believe that their rights or legitimate interests have been violated due to improper actions of the Company or its employees shall have the right to file a claim (complaint) with the Company in the following ways:

11.1. By filling in a claim (complaint) and handing it over to the Client Support Department of the Company at Pilaitės pr. 16, Vilnius;

11.2. By sending the claim (complaint) by mail to Pilaitės pr. 16, Vilnius;

11.3. By sending an email to support@paysera.com. For the purpose of client identification, only claims (complaints) sent from the client's personal email specified in the client's account shall be accepted; On the Company's website www.paysera.lt by filling in the inquiry form published in the "Write us" section;

12. A claim (complaint) may be submitted by an authorised representative of the client (e.g. an attorney representing the client). In this case, the authorised person must provide documents confirming their authority to act on behalf of the client (e.g. a power of attorney or other representation agreement). The document authorising the person to act on behalf of the client shall be copied, certified by the responsible employee (with a stamp indicating "Certified Copy" and the name, surname, position, signature, and date of the person who made and verified the copy against the original), and attached to the claim (complaint). If a claim (complaint) submitted by the client's authorised representative does not include documents confirming the representative's authority, the responsible employee processing the claim (complaint) must request that such documents be provided.

13. The claim (complaint) must specify:

13.1. Full name (for a natural person) of the client/Name of the client (for a legal entity);

13.2. Address of the Client;

13.3. Phone number or email address;

13.4. The date of submission of the claim (complaint);

13.5. The essence of the claim (complaint), i.e. which of the client's rights or legitimate interests have been violated;

13.6. The demands made to the Company;

13.7. Documents related to the claim (complaint), if the client has any;

14. If at least one of the mandatory items of information specified in clause 13 of the Rules is not provided, the Company shall have the right to request the client to clarify (supplement) the claim (complaint).

15. The written claim (complaint) submitted by the client must be written in a neat and legible manner and signed by the client or a person authorised by the client.

16. Oral client claims (complaints) shall be responded to during the conversation, and the client shall be informed that written responses are provided only to written claims (complaints) received.

17. All Client claims (complaints) submitted at the Client Support Department at Pilaitės pr. 16, Vilnius, or sent by mail to Pilaitės pr. 16, Vilnius, must be scanned and forwarded by email no later than the next business day after their receipt to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, who shall register the claim (complaint) in the Claims (Complaints) Registration Log.

18. Client claims (complaints) received by email at support@paysera.com shall be, no later than the next business day after their receipt, assigned in the Zammad system to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, who shall register the claim (complaint) in the Claims (Complaints) Registration Log.

CHAPTER III

PROCESSING OF CLAIMS (COMPLAINTS)

19. In order to ensure impartiality, the Company shall ensure that the handling of a Complaint is not assigned to an employee whose actions or inaction are the subject of the Complaint.

20. Claims (complaints) submitted by clients shall be investigated and the Company's responses thereto shall be prepared and signed by the employee appointed by the Head of the Client Support Department as responsible for the processing of claims (complaints) and the preparation of responses thereto.

21. The Company allocates sufficient human resources to ensure proper handling of Complaints and provides regular training for employees involved in handling Complaints.

22. In exceptional cases, when a claim (complaint) submitted by the client is extensive and/or complex in nature, the claim (complaint) shall be investigated and the response shall be prepared by an employee of the Legal Department, in coordination with the Head of the Legal Department, together with the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto.

23. If a claim (complaint) submitted by the client is related to improper actions of a Company employee, the respective Company employee and their immediate superior must be informed of the decision taken.

24. If an inquiry or claim (complaint) was submitted by email pagalba@paysera.lt, support@paysera.com, podderzhka@paysera.com or another email:

24.1. The response to a claim (complaint) received by email shall be sent to the client from the email address support@paysera.com. The response of the Company shall be sent by the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto.

24.2. All inquiries received by emailsupport@paysera.com shall be responded to by the employees of the Client Support Department, either independently or with the assistance of other Company employees.

25. In all cases, the Company's response to a claim (complaint) sent from the email addresssupport@paysera.com must be coordinated with the Head of the Client Support Department or the head of a division of this department.

26. A claim (complaint) shall be considered resolved when all problem-solving actions have been taken, decisions have been made, and a response has been provided to the client.

27. After investigating a claim (complaint), the Company shall make a decision to recognise the claim (complaint) submitted by the client as:

27.1. Satisfied – the Company acknowledges that the client's demands are legitimate and justified, and takes actions to fulfil them;

27.2. Partially satisfied – the Company partially satisfies the client's demands;

27.3. Not satisfied – the client's demands are unjustified and therefore not met.

28. If the Company decides to refuse to satisfy or to partially satisfy the claim (complaint) submitted by the client, the written response of the Company to the client must meet the following requirements:

29. The Company’s decision to reject a Complaint (or to satisfy it partially) must be reasoned and substantiated by documents (facts) and legal provisions. The response to the Client shall be prepared in the language in which the service agreement was concluded or in another language agreed with the Client. Where the Complaint is not upheld, the Company’s response must be accompanied by documents (or copies thereof) supporting the decision, unless such documents have already been provided earlier.

29.1. If the claim (complaint) submitted by the client disputes a payment transaction that could have been executed by fraudsters and/or due to fraudulent actions, the Company, when investigating the claim (complaint), shall seek to clarify all circumstances related to the execution of the disputed payment transaction and associated with it.

30. The written response of the Company must provide information about the measures for protecting the client’s interests, including but not limited to possible dispute resolution measures and rights.

30.1. In cases where the client is a consumer, the written response provided to them must state that the Company's decision may be appealed to the Bank of Lithuania within one year from the date of submission of the claim (complaint).

30.2. The Company’s written response must include information that the Client may submit a complaint to the Bank of Lithuania in the following ways:

30.3. Via the electronic dispute resolution system:https://www.epaslaugos.lt/portal/. By completing and signing the Consumer Application Form: Consumer Application Form, and submitting it to the Law and Licensing Department of the Bank of Lithuania;

30.4. **Email:** priežiūra@lb.lt or info@lb.lt

30.5. **Address:** Bank of Lithuania, Law and Licensing Department, Totorių St. 4, 01121 Vilnius, Lithuania.

31. If the claim (complaint) submitted by the client is found to be justified, the Company's response shall express regret and include an apology to the client

32. The Company's response regarding refusal or partial satisfaction shall explain the reasons clearly and may propose additional measures to increase the client's satisfaction.

CHAPTER IV

LETTERS FROM COMPETENT AUTHORITIES REGARDING DISPUTE RESOLUTION WITH CLIENTS

33. Letters from competent authorities regarding dispute resolution with clients shall be registered in accordance with the established procedure for handling incoming documents in the Registry of incoming documents in the internal electronic document management system. Letters from competent authorities shall be registered by the Company's administrator.

34. After registering a letter from a competent authority regarding a dispute with a client, the Company's administrator shall forward it or send it by email to the Head of the Client Support Department or the head of the respective division of this Department, who shall immediately forward the letter or send it by email to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of responses thereto.

35. Upon receiving a Client's claim (complaint) forwarded by the Bank of Lithuania or a request from the Bank of Lithuania to provide explanations regarding a dispute being investigated at the Bank of Lithuania:

35.1. The employee responsible for handling Client Complaints (Claims) and preparing responses shall create a separate task in the Company’s Jira task management system only in cases where the situation requires additional investigation, involvement of other departments, or the preparation of a Legal Department opinion. In such cases, all information related to the preparation of the response to the Client and submission to the Bank of Lithuania, including progress and deadlines, shall be recorded in the Jira system.

35.2. The Company's response to the client and/or the Bank of Lithuania must be coordinated with the Legal Department.

CHAPTER V

DEADLINES FOR PROVIDING RESPONSES TO CLAIMS (COMPLAINTS)

36. Upon receiving a claim (complaint) disputing the recognition of a payment transaction as properly authorised, the Company must commence its investigation without delay, and no later than the end of the next business day after receipt of the claim (complaint).

37. Upon receiving a client's claim (complaint), the client shall be informed that their claim (complaint) has been received and registered in the Company's Claims (Complaints) Registration Log no later than within 1 (one) business day.

38. If the client is a consumer, the Company's response to the client's claim (complaint) must be provided no later than within 15 business days from the date of receipt of the written claim (complaint). If it is impossible to provide a response within 15 business days due to reasons beyond the Company's control, a provisional response must be provided to the client, indicating the reason for the delay and the deadline by which the final response will be provided. The deadline for providing the final response cannot exceed 35 business days from the date of receipt of the written claim (complaint).

39. If the client is not a consumer, the Company's response to the client's claim (complaint) must be provided no later than within 30 calendar days from the date of receipt of the claim (complaint).

40. After providing the Company's response to the client's claim (complaint), the Head of the Client Support Department or the head of the respective division of this Department, or the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of responses thereto, shall update the Claims (Complaints) Registration Log, indicating the date of the response and a brief comment on the resolved claim (complaint).

41. Responses to letters from competent authorities regarding disputes with clients shall be provided within 30 calendar days from the date of their receipt by the Company, unless a different deadline is specified in such letters.

CHAPTER VI

EVALUATION OF COMPLAINT (CLAIM) OUTCOMES AND STORAGE OF RESPONSES TO COMPLAINTS (CLAIMS)

42. The Company (Head of the Client Service Department) shall periodically, but at least once a year, perform an analysis of received Complaints, during which it shall:

42.1. Collect information on similar Complaints, identify their root causes, and set priorities for remediation;

42.2. Assess whether the identified root causes may lead to Complaints related to other services;

42.3. Determine and, where necessary, implement measures to eliminate these root causes;

42.4. Ensure that information on systemic issues is regularly provided to the Company’s management.

43. Client Complaints (Claims), responses thereto, and all related handling documentation shall be stored in the operational Zammad system for no less than 5 (five) years from the date of the final response provided to the Client, and shall also be recorded in the Client’s profile in the System.

44. Complaints received from competent authorities and the Company’s responses to such Complaints shall be registered in accordance with the Company’s incoming and outgoing correspondence registration procedure and stored in the internal electronic document management system.

45. The Company shall prepare and submit reports in accordance with the Annex to Resolution No. 03-105 of 6 June 2013 of the Board of the Bank of Lithuania “Rules for the Examination of Complaints Received by Financial Market Participants” and the “Procedure for Submission of Reports on Complaints Received by Financial Market Participants”.

45.1. After the end of the calendar year, and no later than 1 March of the following year, the Company shall submit to the Bank of Lithuania information on received Complaints.

45.2. Reports shall be submitted via the Bank of Lithuania information system REGATA in JSON format, completing the following forms:

45.2.1. **SKND_01 form** (quantitative information);

45.2.2. **SKND_02 form** (assessment of operational deficiencies and adopted decisions).

46. If inaccuracies are identified in the submitted reports, the Company shall correct them and submit revised reports within 5 (five) business days.

CHAPTER VII

FINAL PROVISIONS

47. If the Company decides to recognise a claim (complaint) submitted by the client as satisfied or partially satisfied, or receives comments from competent authorities regarding non-compliance of the services provided with legislation or documents of competent authorities, it shall take measures to eliminate the identified non-compliances and prevent the causes of similar claims (complaints) from arising.

48. These Rules shall be approved and amended by order of the CEO of the Company.

49. These Rules shall be reviewed and, if necessary, amended at least once every two years or more frequently, for example in case of changes in legal requirements or other significant events.

50. The Head of the Client Support Department shall be responsible for submitting proposals regarding amendments to the Rules to the CEO of the Company or the Legal Department.

51. These Rules and their amendments shall be published on the Company's Intranet. Employees of the Company shall be deemed to have been familiarised with the Rules and/or their amendments from the date of their publication on the Intranet.

The Internal Rules for the Receipt and Processing of Client Claims (Complaints) (valid until 18.03.2022)

The Internal Rules for the Receipt and Processing of Client Claims (Complaints) (valid until 26.08.2024)

The Internal Rules for the Receipt and Processing of Client Claims (Complaints) (valid until 02.04.2026)