

COMPLAINTS MANAGEMENT POLICY SUMMARY

INTRODUCTION

The Bank's Complaints Management Policy (the Policy) is designed to ensure that customer complaints about the Bank's products, services and / or conduct of employees are managed through an effective and consistent process that meets the requirements of the Banking Rule BR/22, issued by the Malta Financial Services Authority.

PURPOSE OF THE COMPLAINTS MANAGEMENT POLICY

The Bank aims to provide a high standard service to its customers while also protecting their interest. At the forefront of its corporate values, the Bank is committed to encourage customers to provide it with constructive feedback in order to enable the Bank to improve its services. Feedback received serves as a means of monitoring and improving service delivery to customers, as well as enhancing organisational effectiveness and efficiency. However, feedback may not always be positive and may therefore result in a complaint.

The Policy sets out the Bank's procedures to be followed in the event that a complaint is submitted by any of its customers, with respect to any of the Bank's products, services or conduct of employees.

The Board of Directors and the Chief Executive Officer (CEO) are responsible for the administration of the Policy. This includes the implementation of the Policy (when applicable) and effective assessment, fair management and mitigation of complaints in order to address complaints in a fair and equitable manner.

WHAT IS A COMPLAINT?

A 'complaint' can be defined as a verbal or written statement of dissatisfaction received by the Bank from any of its customers, about any aspect of the Bank's products, services, employee behaviour/ attitude, processes and systems.

WHO CAN LODGE A COMPLAINT?

Any customer of the Bank or their representative/s, who is dissatisfied with the Bank's products or services or behavior of an employee of the Bank, for any reason, may submit a complaint (hereinafter referred to as the "Complainant").

COST

There is no charge to the complainant for submitting a complaint.

HOW TO COMPLAIN

A complaint may be written in the English language and is to be addressed to the Chief Executive Officer (CEO) who will then decide the appropriate matter as to how to handle/route the complaint for further investigation.

Complaints may be submitted by following either of the following procedures:

- a) a formal telephone call to one of the executive secretaries within the CEO Office; or
- b) an email sent to info@eccm.com.mt; or
- c) a formal letter addressed to the CEO and sent to the registered office of the Bank, that is:

ECCM Bank plc
230/231 'The Adelaide'
Tower Road,
Sliema, SLM 1601
Malta

It is recommended that the complaints form available from ECCM Bank's website (accessible via this link: <https://eccm.com.mt/sites/default/files/2026-03/ComplaintsForm-032026.pdf>) or provided upon request is used to submit the complaint. The form includes the initial information required by the Bank to handle the complaint efficiently.

WHAT INFORMATION SHOULD BE INCLUDED WHEN LODGING A COMPLAINT?

When making a complaint, a customer is requested to briefly set out all the facts regarding the issue and provide the following information:

- Name, I.D. Card number or Passport number, and contact details of the person filing the complaint;
- The name of the Company or other person in whose name the complaint is being made;
- Name of the Bank employee who received the complaint (to be completed by the Bank);
- Copies of any documentation supporting the complaint.

Information and personal data provided when lodging a complaint, shall be treated in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the DGPR), the Data Protection Act (Chapter 586 of the Laws of Malta) and other applicable data protection legislation.

The Bank reserves the right to provide information on complaints and complaints-handling to the Malta Financial Services Authority (MFSA) and, to an alternative dispute resolution entity, in the case that a dispute remains unresolved.

ACKNOWLEDGMENT OF COMPLAINTS

Once a complaint is received, the Bank commits itself to acknowledge receipt in writing of the complaint within 2 working days. If a complaint is made verbally, the employee dealing with such complaint shall summarise this in writing and may request the complainant to confirm in writing such summary by endorsing the respective document.

Such written acknowledgement shall include confirmation to the complainant of the:

- a) Complaint reference number
- b) Summary of this issue
- c) Expected resolution time frame and
- d) Contact details to follow-up.

RESPONSE TO A COMPLAINT

In normal circumstances, the Bank should be in a position to process the complaint and respond within 15 working days from receipt of the complaint.

If due to a valid reason, the Bank anticipates that the investigation of a complaint will not be completed within 15 working days from receipt of the complaint, the Bank shall immediately:

- a) inform the complainant that the investigation will not be completed within 15 working days from the receipt of the complaint;
- b) inform the complainant about the reasons of the causes of the delay; and
- c) provide an indication as to when the investigation is likely to be completed, which shall be no later than 35 days from date of receipt of the complaint.

If the complainant is not satisfied with the progress of the investigation, the complainant has a right to refer to other Alternative Dispute Resolution fora

including referring the matter to the Arbiter for Financial Services using the contact details indicated below.

RIGHTS OF A COMPLAINANT DURING THE COMPLAINT PROCESS

The complainant has the right to enquire as to the status of the complaint and also the right to withdraw the complaint by a notification in writing to the Bank's CEO.

RIGHTS OF A COMPLAINANT AFTER THE COMPLAINT PROCESS

When providing a final decision that does not fully satisfy the complainant's demand, the Bank shall, to the extent possible, include a thorough explanation of its position on the complaint and that the complainant may refer to other Alternative Dispute Resolution fora, including complaints with the Arbiter for Financial Services under the Arbiter for Financial Services Act (Chapter 555 of the Laws of Malta) using the following contact details:

Office of the Arbiter for Financial Services
N/S in Regional Road
Msida, MSD 1920
Malta
Telephone: +356 21249245
Email: complaint.info@asf.mt

Information on the submission of complaints to the Arbiter for Financial Services is available via this link: www.financialarbiter.org.mt.