

Order No. 260119 of the Head of UAB Nordstreet on 19/01/2026 (consolidated version from 20/01/2026)

PROCEDURE FOR HANDLING COMPLAINTS

1. GENERAL PROVISIONS

1.1. This Procedure for the Handling of Complaints of UAB Nordstreet (hereinafter referred to as the Company) (hereinafter referred to as the Procedure) establishes the procedure for the management of complaints received by the Company aimed at ensuring:1.1.1. a rapid, fair, effective and appropriate complaint management process;1.1.2. recording and storing complaints, material related to their handling and information on the measures taken to resolve the complaint;1.1.3. continuous evaluation of the results of the examination of complaints and effective elimination of the causes of the occurrence of complaints;1.1.4. periodic evaluation and, if necessary, review of the implementation and effectiveness of this policy;1.1.5. Implementation of Regulation (EU) 2020/1503 (hereinafter referred to as Regulation (EU) 2020/1503), the Rules for the Handling of Complaints Received by Financial Market Participants (consolidated version from 20.01.2026) (hereinafter referred to as the Rules) approved by the Board of the Bank of Lithuania by Resolution No. 03-105 of 6 June 2013 (consolidated version from 20.01.2026) (hereinafter referred to as the Rules) and other requirements of applicable legal acts.

1.2. The procedure has been prepared in accordance with Regulation (EU) 2020/1503, the Rules and other applicable legal acts.

1.3. The procedure applies to complaints regarding crowdfunding services provided by the Company and/or agreements concluded with the Company in relation to the Company's activities as a crowdfunding service provider (platform operator). Procedure does not apply:1.3.1. inquiries (requests for information) that are not a complaint;1.3.2. claims, procedural documents and other legal claims, the examination of which takes place under separate procedures;1.3.3. disputes between the parties to the financing transaction (e.g. the investor and the project owner/borrower), except in cases where the dispute also includes the assessment of the quality/performance of the services provided by the Company (see Section 8).

1.4. During the implementation of the Procedure, the requirements of the legal acts regulating the protection of personal data and the Company's personal data processing rules are complied with.

1.5. The complaint management process in the Company is separate from other processes (management of inquiries, management of claims/court disputes, etc.).

2. DEFINITIONS

NORDSTREET

2.1. Concepts used in the Procedure:

- 2.1.1. The answer is a reasoned written explanation to the applicant of the Company regarding the examined complaint and/or the decision taken.
- 2.1.2. The company is UAB Nordstreet, legal entity code 304565690. Registered office: Naugarduko str. 19, Vilnius, Republic of Lithuania.
- 2.1.3. Client – a natural or legal person to whom the Company provides crowdfunding services.
- 2.1.4. Applicant – the person who has submitted a complaint regarding the services provided by the Company and/or the contracts concluded with the Company (current or potential customer) or his representative.
- 2.1.5. Complaint – a written application submitted by the applicant to the Company, in which it is indicated that the rights of a person or legitimate interests arising from or related to the services provided or contracts provided by the Company have been violated. An application submitted by e-mail and other means of remote communication, which provide an opportunity to properly identify the applicant and prove the fact of filing a complaint, is also considered to be in writing.
- 2.1.6. Person handling complaints – a person (or department) appointed by the head of the Company who is responsible for receiving, registering, examining complaints, making decisions and preparing responses to applicants.
- 2.1.7. Complaint Management Process – The Procedure sets out the actions of the Company's employees related to the receipt, approval, registration, examination of the complaint, informing the applicant, etc.
- 2.1.8. A journal is a complaint registration journal or an electronic document registration system corresponding to it (Annex No. 2).

2.2. Other terms used in the Procedure shall be understood as defined in Regulation (EU) 2020/1503, the Rules and other applicable legal acts.

3. MAKING COMPLAINTS

3.1. The Applicant, who believes that his rights or legitimate interests have been violated in relations with the Company, may submit a complaint in writing himself or through a representative in accordance with Annex No. 1 (Complaint Form) to this Procedure.

3.2. The complaint must contain at least the following minimum information:

- 3.2.1. if the applicant is a natural person: name, surname, contact details;
- 3.2.2. if the applicant is a legal entity: name, registration number, LEI code (if applicable), contact details;
- 3.2.3. if the applicant is represented: details of the representative and the basis for representation (attaching a power of attorney or other document);
- 3.2.4. a reference to the investment and/or contract to which the complaint relates;
- 3.2.5. the essence of the complaint is the impugned actions (omissions) of the Company and the applicant's claims;
- 3.2.6. date(s) of the events to which the complaint relates;
- 3.2.7. date and place of submission of the complaint;
- 3.2.8. a list of accompanying documents.

3.3. Complaints shall be examined in Lithuanian or in another language, if the Company and the applicant agree on this.

3.4. The complaint shall be submitted in writing to the Company in one of the following ways:

- 3.4.1. by submitting upon arrival to the Company's customer service/correspondence reception address: A. Domaševičiaus str. 9, Vilnius (D9 business centre);
- 3.4.2. by post or courier to the following address: Konstitucijos pr. 26,

NORDSTREET

Vilnius (D9 business centre);3.4.3. by e-mail: info@nordstreet.lt(it is recommended to submit the complaint as a separate annex);3.4.4. other means of remote communication used by the Company (e.g. account environment/help centre), if in this way it is possible to properly identify the applicant and prove the fact of filing a complaint.

4. RECEIPT AND REGISTRATION OF COMPLAINTS

- 4.1. Upon receipt of the complaint by the Company, the employee who accepted the complaint shall forward the complaint to the person examining the complaints on the same business day. The fact of receipt of the complaint shall be confirmed to the applicant as soon as possible (if the applicant's contact details allow it to be done).
- 4.2. A complaint may be considered inadmissible if: 4.2.1. the complaint submitted does not comply with the minimum requirements set out in Chapter 3 and the applicant does not eliminate them within the time period specified by the Company;4.2.2. an identical complaint is filed on which the Company has already made a decision, or a dispute on the same subject matter is examined in court or other competent authority;4.2.3. the complaint has been filed more than 3 months after the date on which the applicant became aware or should have become aware of the violation, except in cases where the applicant indicates objective reasons for missing the deadline or the Company decides to examine the complaint in order to ensure the effectiveness of the complaint management process and the best interests of the clients.
- 4.3. If the complaint is considered inadmissible, the applicant shall be provided with a clear explanation as to why the complaint cannot be dealt with and, where applicable, other remedies shall be indicated.
- 4.4. After the complaint has been accepted for consideration, the applicant shall be provided with the following information:4.4.1. Contact details of the person handling complaints;4.4.2. the time limits for the examination of the complaint in accordance with points 5.8 to 5.9.
- 4.5. Each accepted complaint shall be recorded in the Journal (Annex No. 2).
- 4.6. The following mandatory data shall be entered in the logbook:4.6.1. name of the applicant;4.6.2. contact details of the applicant;4.6.3. date and manner of receipt of the complaint;4.6.4. Complaint registration number (if applicable in the Company's registration system);4.6.5. the essence of the complaint (brief content);4.6.6. the complained Company's services/type of product;4.6.7. Date of submission of the reply to the applicant;4.6.8. final outcome of the complaint;4.6.9. the name, surname, position of the employee of the Company who examined the complaint and submitted the response.
- 4.7. Other actions related to the examination (e.g. internal meetings, recourse to external consultants, etc.) may also be recorded in the logbook.

5. HANDLING OF COMPLAINTS

- 5.1. When examining complaints, the Company is guided by the principles of respect for human rights, justice, honesty, reasonableness, objectivity, impartiality and promptness.

5.2. The person examining the complaints himself or herself examines the complaint and prepares a response or instructs the competent employees of the Company to investigate the circumstances indicated in the complaint and submit a draft response formulated in writing.

5.3. The person examining complaints may not examine the complaint if the complaint is submitted due to his own actions (omissions) or circumstances that may cause a conflict of interests. In such a case, he resigns and informs the head of the Company, who appoints another impartial person.

5.4. The person examining the complaint must, *inter alia*:5.4.1. collect and evaluate documents and data related to the complaint;5.4.2. to analyze the applicant's service history;5.4.3. assess the applicant's previous complaints (if any);5.4.4. if necessary, request additional information;5.4.5. to ensure clear and understandable communication with the applicant.

5.5. Complaints shall be considered in writing. In exceptional cases, meetings of the parties may be organised with a view to reaching a peaceful solution.

5.6. Complaints are examined free of charge.

5.7. The applicant is informed about the essential actions necessary for the examination of the complaint (if relevant) and justified questions are answered.

5.8. The Company must examine the complaint and provide the applicant with a comprehensive, reasoned, documented final response as soon as possible, but not later than within 15 working days from the date of receipt of the complaint.

5.9. In exceptional cases, when it is not possible to provide a final answer within 15 working days for reasons beyond the Company's control, the Company shall provide a provisional answer within this period, clearly indicating the reasons for the delay and the deadline by which the applicant will receive the final answer. In any event, the time limit for submitting a final reply may not exceed 35 working days from the date of receipt of the complaint.

5.10. If the petitioner refuses his/her claims in writing, the examination of the complaint shall be terminated and an entry shall be made in the Journal.

6. DECISION-MAKING AND RESPONSE

6.1. The answer shall take into account all the questions raised in the complaint and shall state the reasons for the decision. Decisions on similar complaints must be consistent, unless the difference is based on objective circumstances.

6.2. The reply shall be provided to the applicant in writing by e-mail or (at the request of the applicant) on paper/other durable medium, if agreed.

6.3. The reply shall indicate at least:6.3.1. date of submission of the reply;6.3.2. reasoned answer (facts, contract terms and/or legal norms relied upon);6.3.3. List of documents to be annexed (if attached);6.3.4. the name, position (and signature, if applicable) of the person who prepared the response;6.3.5. If the complaint is not satisfied or is partially satisfied, the remedies for the applicant's interests (including

NORDSTREET

possible dispute resolution methods, competent authorities and/or court) shall be indicated.

6.4. Responses to complaints shall be coordinated with the Director (Manager) of the Company or his/her authorized person.

6.5. If the Company is not responsible for the performance of the activities indicated in the complaint, the applicant shall be informed of the reasons for the refusal to examine and, if possible, the entity responsible for examining the relevant issue shall be indicated.

6.6. If the Company does not satisfy the claims of the applicant (consumer) or partially satisfies them, the applicant has the right to apply to the Bank of Lithuania for an out-of-court settlement of the dispute with the financial services provider in accordance with the procedure established by the Bank of Lithuania (applying the terms and conditions provided for in legal acts).

6.7. Information on the procedure for the settlement of disputes with financial service providers is published on the website of the Bank of Lithuania.

6.8. If the applicant is not a consumer or the dispute is not attributable to the competence of the Bank of Lithuania, the applicant has the right to defend his/her rights in court in accordance with the procedure established by legal acts of the Republic of Lithuania.

6.9. Complaints, materials related to their examination, decisions, responses to applicants and other information related to the complaint management process shall be stored in the Company within the terms established by legal acts, but not less than for 3 years from the date of submission of the final response, unless longer storage periods are established in other legal acts.

6.10. Documents for the handling of complaints shall be kept in such a way as to ensure their confidentiality, integrity and accessibility only to authorised persons.

7. ANALYSIS AND PREVENTION OF COMPLAINTS

7.1. The Company periodically (at least once a year) performs an analysis of the received complaints in order to:7.1.1. identify the most common causes of complaints;7.1.2. assess the effectiveness of the complaint-handling process;7.1.3. identify possible systemic deficiencies in the Company's activities, processes or documents.

7.2. The results of the complaint analysis can be used:7.2.1. improvement of internal processes, procedures and controls;7.2.2. training and strengthening of competences of employees;7.2.3. improving the quality of service provision;7.2.4. internal documents and contracts.

7.3. If necessary, the results of the analysis of complaints shall be presented to the Head of the Company and/or used in the preparation of information provided to supervisory institutions.

8. DISPUTES BETWEEN THE PARTIES TO A FINANCING TRANSACTION

NORDSTREET

8.1. In cases where a complaint is submitted to the Company regarding a dispute between the parties to the financing transaction (e.g. the investor and the project owner/borrower), the Company: 8.1.1. assess whether the complaint falls within the scope of this Procedure; 8.1.2. examines only the part of the complaint that relates to the activities, actions or omissions of the Company as a crowdfunding service provider.

8.2. The Company is not an arbitrator of a dispute between the parties to the financing transaction and does not make decisions on the fulfilment of obligations between the parties, except for cases where it is directly related to the compliance of the services provided by the Company with the applicable legal acts and agreements.

8.3. The petitioner shall be informed about the boundaries of the dispute and possible alternative ways of redress of interests.

9. FINAL PROVISIONS

9.1. This Procedure shall come into force from 20 January 2026.

9.2. The Procedure shall be approved, amended and repealed by the Head of the Company.

9.3. The Head of the Company and the responsible persons appointed by him shall be responsible for the implementation and compliance with the Procedure.

9.4. The Procedure shall be reviewed at least once a year or in the event of a change in the applicable legal acts, requirements of supervisory authorities or the Company's business model.

9.5. The procedure shall be published on the Company's website and/or in any other way chosen by the Company, ensuring its accessibility to the Clients.

Annex 1 to
UAB Nordstreet Complaint Handling Procedures

COMPLAINT FORM

1.a Details of the applicant:

Name, Surname / Name	
Registration code and LEI (if applicable)	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Phone number	
E-mail address	

1.b Contact details of the applicant (if different from 1.a):

Name, Surname / Name	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Phone number	
E-mail address	

2.a Details of the representative (if applicable) (the appointment of the representative shall be evidenced by a power of attorney or other official document):

Name, Surname / Name	
Registration code and LEI (if applicable)	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Phone number	
E-mail address	

2.b Contact details of the representative (if different from 2.a):

Name, Surname / Name	
Address (address of registered office for companies) (street, house and apartment number, postal code, city, state)	
Phone number	
E-mail address	

3. Information about the complaint

NORDSTREET

3.a The investment and/or contract to which the complaint relates (i.e. investment number, name of the project owner/company and/or crowdfunding project, other information about the relevant transaction)

3.b Description of the subject-matter of the complaint (clearly indicate the subject-matter of the complaint)

Provide documents confirming the stated facts.

3.c Date(s) of events to which the complaint relates

3.d Description of the damage, loss or loss incurred (if applicable)

3.e Other comments or information (if applicable)

Date, place of the complaint and signature of the applicant

Documents attached to the Complaint (tick the appropriate box):

<i>Power of attorney or other document of representation;</i>	
<i>A copy of the investment agreement related to the complaint;</i>	
<i>Other documents related to the complaint (please insert):</i>	