

Complaint policy

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1. Introduction

1.1. Purpose and objectives

This Policy is established to promote transparent and efficient procedures for the handling and processing of complaints received by Íslandsbanki hf. (hereinafter the Bank) from customers. For the purposes of this Policy, customers include both individuals and legal entities that have, or have had, a business relationship with the Bank, as well as prospective customers.

It is the Bank's policy that complaints and other similar customer enquiries shall receive prompt, efficient, objective and fair treatment.

1.2. Legal background

This Policy is established on the basis of Article 6 of the Rules on Normal and Healthy Business Practices, Communication with Customers and Handling of Complaints No. 353/2022, cf. Article 19 of the Act on Financial Undertakings No. 161/2002, and in accordance with the requirements of Commission Delegated Regulation (EU) 2017/565.

2. Registration and communication methods

For the purposes of this Policy, a complaint means any expression of dissatisfaction addressed to the Bank regarding services, the handling of matters, or the way in which a business relationship has been conducted.

Complaints should generally be submitted in writing and can be conveyed via email, mail or submitted electronically via the Bank's website.

The Customer can submit a complaint free of charge.

Each complaint shall be registered centrally by the employee who receives it, in accordance with the applicable procedures. The Bank maintains a register of complaints and their handling, and such information shall be retained for a minimum of five years.

All processing of personal data shall be carried out in a fair, objective and lawful manner, and all handling thereof shall be in accordance with good personal data processing practices and the Bank's Privacy Policy.

3. Responsibilities

Managing Directors are responsible for ensuring that complaints relating to their area of responsibility are addressed in accordance with this Policy and the Bank's procedures.

CEO's Office oversees the handling of complaints and provides guidance and support to other departments within the Bank, as appropriate in consultation with other units. CEO's Office monitors and analyses the handling of complaints and informs the relevant units of their main causes so that appropriate measures can be taken to improve the Bank's services.

The Bank's Legal Department, Compliance or the Bank's Data Protection Officer shall be consulted, as appropriate, where necessary in the handling of complaints.

4. Procedure

All complaints are reviewed by the Bank. If the Bank decides that no action is warranted in response to a complaint, it shall explain the reasons for that decision. The Bank shall acknowledge receipt of the complaint and provide information on how it will be handled. The complaint shall be answered in writing, or by equivalent means to those by which it was received, within a reasonable time and no later than four weeks from receipt.

If it is not possible to respond to a complaint within the time limit, the customer shall be informed of the delay, the reasons for it and when a response can be expected.

Appropriate documents and information relating to the complaint shall be obtained, and such material shall be assessed objectively on the basis of the relevant law and the information available.

If the Bank receives an unclear complaint from a customer such that it is not clear how to respond, the employee receiving the complaint shall request further information from the customer so that the complaint can be processed.

All communications and responses to customers shall be clear, and equal treatment among customers shall be observed. If a customer's complaint is not upheld, that conclusion shall be reasoned in the response to the customer. The customer shall also be provided with information on how the dispute may be pursued further.

The Bank reserves the right to disregard complaints or communications that are improper, irrelevant or involve threats against employees or their families. Serious or repeated threats may be reported by the Bank to the police.

5. Follow-up and processing of complaints

Where a customer's complaint is found to be justified, CEO's Office shall assess whether it is an isolated incident or whether remedial measures are needed to prevent errors or inconvenience to customers, for example through changes to procedures within the Bank. The results of this assessment shall be retained with the complaint records.

CEO's Office is required to notify the Bank's Legal Department and Compliance of all complaints relating to alleged breaches of laws, regulations or the Bank's internal rules or procedures.

6. Monitoring

Compliance shall regularly assess and analyse the handling of complaints and inform the Operations and Security Committee and, in consultation with Risk Management, assess any possible operational risk relating to this area.

Risk Management monitors whether the handling of complaints is in accordance with this Policy and informs the Operations and Security Committee, the All Risk Committee and the Board of Directors of the status and handling of complaints.

7. Rulings and legal remedies

The Bank's customers may refer disputes to the Complaints Committee on Transactions with Financial Firms.

Information on other remedies within the Bank, as well as administrative and judicial remedies, is provided on the Bank's website.

Individuals may contact the Bank's Data Protection Officer regarding any issues relating to the processing of their personal data and how they may seek to enforce their rights under data protection legislation.

The Financial Supervisory Authority provides guidance to customers of financial undertakings in accordance with the duty of administrative authorities to provide guidance. Further information is available on the FSA's website.

8. Implementation and review

In order to implement this Policy, CEO's Office shall maintain a documented procedure for the handling of complaints that is accessible to all staff and keep adequate records of complaints and their handling.

This Policy is approved by the Bank's Board of Directors and shall be reviewed every two years.

This document is a translation of the Icelandic version of the policy. In case of discrepancy between the documents, the Icelandic version prevails.