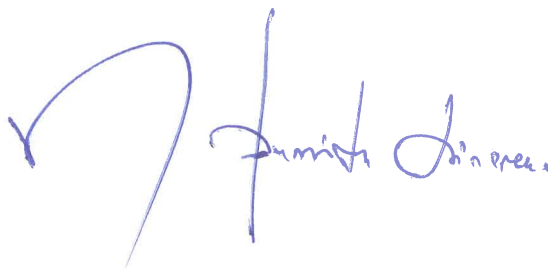


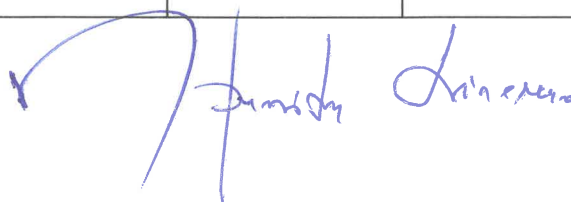
Regulation
on Customer Petitions Resolution Mechanisms
within O.C.N "Microinvest" SRL

(version 1.8)



August 2025

Endorsement					
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1 General provisions

1.1 Objective

This Regulation has been developed in accordance with the legislation in force of the Republic of Moldova and it is an essential part of the prudent risk management within the OCN "Microinvest" SRL (further referred to as the Company). The Regulation establishes the manner and procedure for the examination and resolution of petitions received from customers and other persons (further referred to as the Customer or petitioners).

The main purpose of the Regulation is establishing the mechanism and determining the way in which Company representatives should manage petitions received in connection with the activity carried out, and consequently about the reception, registration, analyzing, determining the measures, and responding to them in legally prescribed terms.

Other purposes of the Regulation are:

- Determining the way of proceeding and monitoring over examination within the Company, of petitions and complains received from Customers;
- Ensuring the company's competitiveness on the financial market (protecting the interests of customers through improving the quality of services provided and relationships with customers).

The "Customer Petitions Resolution" OCN "Microinvest" SRL Regulation is approved by the Administrative Board and is reviewed whenever as needed.

This regulation does not apply to requests, claims, complaints, statements, or other inquiries submitted by the Company's employees in connection with the performance of employment relationships.

1.2 The legal framework

- Law on Non-Banking Credit Organizations #1 of 16.03.2018;
- Law # 105 of 13.03.2003 on the consumer protection;

Law # 202 of 12.07.2013 on consumer loan agreements;

- Decision of the CNFM # 38/14 of 28.09.2012 regarding the approval of the Regulation of the procedure for the examination of petitions by professional participants on the non-banking financial market.

2. Definitions and abbreviations

2.1 Definitions

Petition – in the context of this regulation, a petition is a written (received on paper or by corporate e-mail), electronic or verbal statement that makes a request, proposal, complaint or any other act of will by

the petitioner addressed to the Company concerning services, employees, documents or company's activity as well as the failure to resolve a request within the deadline.

Petitioner – an individual or legal person or group of persons who complain to the Company under the law and / or this regulation.

Petitions Record Registry - an electronic document owned by ICU, with the purpose of recording, storing all petitions and acknowledgements. Based on this registry, reports will be generated on the record of petitions and their status.

Responsible Department - the owner of the process that caused the appearance of the petition and/or acknowledgement, and it is responsible for preparing the response for petition or, as the case may be, prepare the response in accordance with this Regulation and propose its final version.

The Person who Receives the Petition - any employee of the Company who received a petition from the customer or third parties through any available in the company channel.

Internal Control Unit - internal subdivision of the Company, whose employees are responsible for examining petitions and managing the work process with the petitions received by the Company.

Secondary Office - the internal structural unit of the Company, located outside the head office.

2.2 Abbreviations

NCFM - National Commission for Financial Market;

CEO – Chief Executive Officer of OCN "Microinvest" SRL;

OCN - Non-Banking Credit Organization;

SO - Secondary Office;

HO - Head Office;

ICU- Internal Control Unit;

SMT - Senior Management Team;

3. Objectives of the normative act

All petitions must be resolved by the Company to the fullest extent possible under the terms and conditions described in this Regulation and in the "Petitions Management Procedure within O.C.N "Microinvest" SRL. Each petition is an important tool for improving the quality of customer service of the Company in the future. Petitions which according to the "Petitions Management" Procedure do not require an official response from the Company, including acknowledgements from the customers, are reviewed as well.

Each Customer has the right to submit a petition whenever he/she considers that the company is not consistent in providing the agreed services or conditions, or his/her rights as a client have been violated. Petitions can also be made when customers are dissatisfied with the quality of the services provided, the behavior of the company's employees, the situations considered deviations from legal or contractual terms.

The company offers customers multiple channels for submitting petitions, through which Customers can submit their claims. The variety of petitions receiving channels show the Company's openness to customer

communication with the purpose of resolving petitions as quickly and efficiently as possible, as well as continuously improving the Company's services.

4. Types and content of petitions

4.1 Types of Petitions

Petitions can be classified into two types:

Verbal - are those petitions in which the complainant is speaking directly or on the phone with a company employee, expressing his request, dissatisfaction or gratitude to the Company's services or its employees.

Written - all petitions except verbal, expressed in physical or electronic form.

Petitions can also be classified into personalized and anonymous.

4.2 Content of the petition

The process of investigating petitions / requests and preparing the response is regulated in details by the Procedure on "Petitions Management".

For investigating the reported/requested situations and preparing the response, written petitions must contain the following information:

- Identification data: first name, last name/company name, personal ID number/tax code;
- Contact details: correspondence address, phone number, email address;
- Detailed description of the situation (including description of the service referred to, name of the employee contacted) and aspects to be improved;
- Copies of relevant documents for resolving the petitions;
- Date of submission and petitioner's signature (the electronic petition must comply with the requirements for electronic documents).

The petition must also be accompanied, if applicable, by documents confirming the powers of representation.

In cases where a petition has been received, the text of which cannot be deciphered or any information from the content of the petitions has been omitted, making it impossible to examine, the complainant will be notified within 3 working days of this fact, requiring the necessary information to specify the issue.

If a petition is addressed by mistake (not addressed to the Company), it will be returned to the complainant within 3 working days.

The Company reserves the right not to respond to the following petitions, which will be considered anonymous:

- a) Petitions whose initiators cannot be identified;
- b) Petitions that are not signed by the petitioner, do not contain the petitioner's full name, address, and other identification details, and in the case of electronically submitted petitions – do not have an electronic signature applied and do not contain information regarding the petitioner's full name, address, email address, and other contact details.

For investigating the reported/requested situations and preparing the response, verbal petitions must include the following information:

- Identification data: first name, last name/company name, personal ID number/tax code;
- Contact details: correspondence address, phone number, email address;
- Detailed description of the situation (including the description of the service referred to, name of the employee contacted) and aspects to be improved;
- Preferred method to receive the response (phone, email, official letter);
- Other relevant information related to the situation.

5. Petition process

The petition process is divided into two stages:

- Receiving petitions.
- Petition processing.

5.1 Receiving petitions

By means of the informative materials placed at the Company's SO, on the website <https://microinvest.md/en/sesizati-o-incalcare/> and by the means of its employees, the Company informs clients/ third-party persons about the channels through which petitions can be submitted.

All petitions, as well as the responses to them will be registered in the incoming and outgoing correspondence register kept by the company.

In the case of receiving the Verbal Petition, Company employees are obliged to hear out the complainant with politeness and care, ensuring that the information is correctly recorded so that the petition can be analyzed and resolved. The employee who has received a Verbal Petition must note the content of the petition and must forward it to the ICU via e-mail, superior shall be in copy.

ICU is responsible for maintaining, registering, and managing the flow related to receiving and resolving petitions in due time. The maintenance, recording and management of the petitions flow will be made through the Petitions Record Registry under the "Petitions Management Procedure".

ICU may request from one SMT member the opinion on who should be the owner of the petition if it is difficult to identify the person in charge. In case of petitions that represent a high degree of risk to the company's reputation, or may cause some financial loss, the ICU from the start notifies at least one SMT member.

5.2 Petition Processing

All petitions received by Company employees and registered by ICU will be distributed according to the Procedure for "Petition Management" within OCN "Microinvest" SRL.

5.2.1 Processing of verbal petitions, written on paper, and electronic

The ICU after receiving the petitions will forward them to the responsible department for examination and later based on the opinions/decisions received from them will formulate an answer or, as the case may be, will request the preparing of the answer by the responsible department, which after approval will be sent to the complainant. If the employee of the company is the cause of the claim, then a decision to request a written explanation could be made¹. The reply formulated for the complainant/petitioner must be adequate, coherent and respond to all its requests. Once the letter has been signed, it will be sent to the complainant by Moldovan Post Office, or by other electronic means, including on the channel of its receipt or on the request of the petitioner.

If the complainant wishes to receive the reply by e-mail, the letter with the response to the petition will be sent via e-mail, being included in confidential copy of the Manager of the Responsible Department and the ICU.

If the complainant wishes to receive the verbal answer, or if the petition was submitted verbally and the petitioner did not request another form of answer, then the final draft will be communicated to the complainant either by telephone or by the means of direct discussion. It is important that the person who held the discussion with the applicant should note the details of the discussion in free form, either on paper or in an electronic document attached to the petition material, or completed in the petition record register if the answer was communicated by ICU or if the call was recorded, the audio recording will be attached.

Mentions about the verbal petition received and the response given will also be made in the Incoming and Outgoing Correspondence Register maintained by the Company, based on the information provided by the ICU.

¹ ICU may request an explanation from the employee involved only in cases with high reputational or financial risk for the Company.

Petitions submitted a second time that do not contain new arguments or information will not be re-examined; the petitioner will be informed in writing or electronically about this. The employee of the ICU who examined the petition initially is responsible for providing this information. The response must be concise but should include details about the previous response given.

6. Terms for examining and sending replies for petitions

If the employee receives a petition through any communication channel, he is required to pass it on to the ICU. The Regional Manager/Head of Department is responsible for monitoring the process of forwarding petitions to ICU in due time.

The terms for examining petitions and submitting answers to the petitioner are:

- Maximum 14 calendar days from the receipt of the petition from the customers using Company's services.
- Petitions other than those mentioned in the previous points will be examined within a maximum of 14 calendar days from the receipt and registration of the petition. Petitions that require further or in-depth study and examination may be examined within a maximum of 30 days.
- The terms for examining the petition may, in special cases, be extended by a maximum of one month, with notification of the petitioner about the extension, in cases where:
 - Additional consultations are required for preparing the response;
 - The petition refers to a complex volume of information or requires the review of additional materials that need to be selected for response preparation;
 - An internal service investigation needs to be initiated;
 - Other reasonable circumstances prevent the response from being formulated within the initial deadline.
- Petitions received from the supervisory authorities or other national authorities shall be examined within a maximum of 14 days from the receipt and registration of the petition, or within a shorter period expressly provided in the request.

More detailed provisions regarding the terms of registration, internal management, examination and presentation of the response to the Petitioner, are stipulated in the Procedure on "Petitions Management" within O.C.N. "Microinvest" SRL.

7. The reports preparation

For each quarterly Risk Committee, ICU will prepare a report, according on the "Petition Management Procedure", based on the Petition Record Registry, and will review petitions received during the previous quarter.

For the purpose of managing operational risks at the end of each year, or as required by SMT members' advice, ICU will carry out an analysis of petitions for the previous year or for another indicated period, based on criteria established by the ICU or based on criteria approved by the SMT.

8. Company's Rights

1. In case of a clear violation of the legislation in force or internal regulations is found during the process of receiving or examining the petition, the Company has the right to set an additional deadline for conducting the investigation and creating an investigation commission.
2. In the case when the job investigation reveals that the employee/employees have violated the legislation or internal regulations, the Company has the right to apply the disciplinary sanctions according to the legislation in force.
3. If it is found that the actions invoked in the petitions have constitutive signs of contravention or offense, or reputational or financial damage to the Company is significant, the Company has the right to address the competent law bodies.
4. In the case that a petition contains threats to the security of the company's assets, to the life and health of employees and their family members, the Company has the right to remit them to the competent law enforcement authorities.

9. Final provisions

1. This Regulation, after Company's Board approval, will be communicated to all employees by email by the Office Manager or the person replacing it.
2. If, after the date of this regulation coming into force, a statutory and/or statutory provision amends/supplements/revokes its provisions, the statutory and/or legal provisions in force with the application of the subsequent amendment of the regulation(s) (with regard to "Petitions Management" inclusive) within 6 months, unless the legal provision provides otherwise, or the Company's senior management bodies do not set another term.
3. The Petition Process is described more detail in the "Petition Management Procedure".