

Report on complaints management activity - Year 2023

The provisions of the Bank of Italy of 07.29.2009, (§ 3, section a report on the complaint management activity with the related data.

Attention to *Customer Satisfaction* has always characterized the work of Solution Bank SpA and the aforementioned transparency provisions represented an opportunity to strengthen the bank's bond with its customers by launching an awareness campaign among its counter staff /front office aimed at strengthening attention to the Customer's needs.

The management of complaints is entrusted to a specific specialized structure, called the Complaints Office, which operates according to a procedure defined and approved by the Board of Directors of the Bank. Upon receipt of a complaint, the internal evaluation process begins which involves all the company structures concerned in the activities necessary to understand the incident in order to arrive at the subsequent definition and adoption of any corrective measures suitable for settling the complaint.

To protect the relationship of trust with the Customer, even if the validity of the complaint received is not established, the designated structure provides adequate reasons underlying the decision taken.

The complaining Customer is promptly confirmed that the complaint has been taken care of by the Complaints Office and, subsequently, written feedback is always provided within the deadlines set by the law, adequately publicized by the Bank both in the branch network and on its website , that is to say:

- 15 working days from receipt of the complaint regarding payment services (if, in exceptional situations deriving from causes of force majeure or in any case beyond the control of the Bank, including strikes, malfunctioning of the information system, etc. or cases of particular complexity that imply the need for technical insights or that involve third party suppliers or other payment service providers, etc..., the Bank is unable to respond within 15 working days, sends the customer an initial response, clearly indicating the reasons of the delay and specifies the deadline within which the customer will receive the final response, in any case not exceeding 35 working days);
- 60 calendar days from receipt of the complaint regarding operations and services banking and finance;
- 45 calendar days from receipt of the complaint regarding products and services insurance/supplementary pension;
- 60 calendar days from receipt of the complaint regarding investment services.

This communication intends to give an account of the complaints received by the Complaints Office of Solution Bank SpA in the period **1 January - 31 December 2023** relating to banking and financial operations and services.

For completeness, a summary report is also provided regarding complaints relating to investment services and insurance products and services.

The data is contained in concise tables with analytical evidence of the service/product subject to the complaint and the related reason.

The classification of the operations and services affected by the complaints, as well as the definition of the reasons for the complaint, follow the ABI taxonomy (periodic complaints monitoring) as well as, for investment services, the Consob analytical reasons (resolution 17297/2010, appendix II.6) and for insurance products and services as defined in the statistical table referred to in annex no. 2 to IVASS Order no. 46/2016.

During the reference period Solution Bank SpA received from its customers n. 42 complaints (no. 38 relating to banking and financial operations and services; no. 3 relating to investment services and activities and no. 1 relating to insurance services and activities) of which no. 8 were accepted, n. 1 was partially accepted, n. 31 were not considered worthy of acceptance and n. 2 have been withdrawn by customers.

In particular, it is noted that during 2023:

• compared to the no. 31 complaints not accepted, n. 2 complaints were notified to the Bank directly with a complaint submitted to the Bank of Italy. The Complaints Office promptly provided feedback (to complaining customers and to the Bank of Italy) regarding the failure to accept the complaints without receiving further communications in this regard from the Supervisory Authority;

• compared to the no. 31 complaints not accepted, no customer subsequently filed a complaint to the Bank of Italy;

• compared to the no. 31 complaints not accepted, n. 1 Customer has lodged an appeal with the “Conciliamoci” Mediation Body¹;

• no Customer has lodged an appeal with the ACF – Arbitrator for Financial Disputes;

¹ On 12/14/2023 the mediation procedure was closed and the parties' lawyers reached an agreement: payment by the Bank, without any recognition regarding the validity of the parties' mutual claims but for the sole purpose of removing the uncertainties related to the existence of existing disputes, of €1,500.00 as an all-inclusive sum.

COMPLAINTS RELATING TO BANKING/FINANCIAL OPERATIONS AND SERVICES (total no. 38)					
Outcome of complaints	Accepted: n. 7	Partially accepted: n. 0	Not accepted: n. 29	Not prosecutable: n. 2	In investigation: n. 0
Type of complainant*	Private customer: n. 30	Intermediate customer:	Others: n. 4		
Type of products/services	- current accounts: n. 5 - savings deposits: n. - securities dossier: n. 4 - credit opening: n. - consumer credit: n. - real estate credit to consumers: n. - personal loans: n. - home loans: n. - special credits: n. - other forms of financing: n. - bank transfers: n. - salaries and pensions: n. - credit cards with final payment: n. - revolving credit cards: n. - debit cards - withdrawals cash (ATMs and other circuits): n. 3 - debit cards – funds transfer (pagobancomat and others): n. - prepaid cards: n. - checks: n. - riba effects: n. - other collection and payment services: n. - pension and supplementary pension funds: n. - derivative products: n. - foreign service: n. - safes: n. 1 - website (site management): n. - home banking: n. - general aspects: n. 20 - other: n. - risk centre: n. 5 - anatocism: n. - transparency: n.				
Reasons**	- conditions: n. - application of conditions: n. 1 - execution of operations: n. 20 - equipment malfunctions: n. - organizational aspects: n. 12 - staff: n. - communications/ information to the customer: n. - creditworthiness or similar: n. - reporting to the risk center: n. 5 - fraud and losses: n. - anatocism: n. - other: n.				
Distribution channel	- counter: n. 34 - bank/Home Banking website: n. 4 - clear pacts website: n. - ATM/self service: n. - call center / phone banking: n. - financial promoter: n. - credit broker: n. - merchant/dealer: n. - not available: n.				

* the type of customer is borrowed from the ABI taxonomy: **Private customer:** person who qualifies as a consumer pursuant to art. 3/A of Legislative Decree 206/2005. "Intermediate customers" are also included when they act in a "private" capacity, i.e. for purposes unrelated to any professional or entrepreneurial activity carried out.

Condominiums are also considered private customers. **Intermediate customer:** small businesses, artisans, professionals, traders, schools, associations and partnerships; **Others:** types not included in the previous definitions (capital companies, ASL, municipal companies, other companies,...).

** Reference is made to the reason indicated by the Customer in the complaint, regardless of its validity. In the case of complaints connected to more than one reason, only the prevailing reason is reported.

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COMPLAINTS RELATING TO INVESTMENT SERVICES (total no. 3)				
Outcome of complaints	Accepted: n. 0	Partially accepted: n. 1	Not accepted: n. 2	In investigation: n. 0
Type of complainant*	Private customer: n. 3 Intermediate customer: n. 0 Others: n. 0			
Type of products/ services	- trading on own account: n.			
	- execution of orders on behalf of customers: n.			
	- titles: n.			
	- repurchase agreements: n.			
	- portfolio management: n.			
	- reception and transmission of orders: n.			
	- investment consultancy: n. 3			
	- subscription/placement with firm or guarantee assumption by issuer			
	- placement without firm assumption or assumption of guarantee by issuer			
	- online trading: n.			
	- management of multilateral trading systems: n.			
	- custody and administration: n.			
	- granting of loans: n.			
	- foreign exchange brokerage: n.			
	- other ancillary services: n.			
	- insurance classes III and V: n.			
Reasons**	- unauthorized operations: n.			
	- inadequate operations: n.			
	- inappropriate operations: n.			
	- operations in conflict of interest: n.			
	- incorrect execution of orders: n.			
	- delayed execution of orders: n.			
	- failure to execute orders: n. 1			
	- inadequate information prior to the operation: n. 1			
	- inadequate information following the operation: n.			
	- application of commissions different from those contractually established: n.			
	- failure to comply with the management mandate: n.			
	- unsatisfactory returns: n. 1			
	- delays in closing relationships and/or transferring assets and financial instruments to another intermediary: n.			
	- failure to sign or deliver the written contract: n.			
	- failure to deliver requested documentation: n.			
	- failure or delayed response to another complaint: n.			
	- failure or incorrect assignment of financial instruments in OPV: n.			
	- other: n.			

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Condominiums are also considered private customers. Intermediate customer: small businesses, artisans, professionals, traders, schools, associations and partnerships; Others: types not included in the previous definitions (capital companies, ASL, municipal companies, other companies,...).

** Reference is made to the reason indicated by the Customer in the complaint, regardless of its validity. In the case of complaints connected to more than one reason, only the prevailing reason is reported.

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COMPLAINTS RELATING TO INSURANCE PRODUCTS AND SERVICES (Total no. 1)				
Outcome of complaints	Accepted: n. 1	Transactions: n. 0	Rejected: n. 0	
Type of complainant*	Private customer: n. 1	Intermediate customer: n. 0	Others: n. 0	
Type of products/ services				
	<div>Life section:</div> <div>- death case: n.</div> <div>- life case: n. -</div> <div>mixed: n.</div> <div>- index linked: n.</div> <div>-unit linked: n.</div> <div>-multi-branch: n.</div> <div>-capitalisation: n.</div> <div>- social security: n.</div> <div>-others: n.</div> <div>Damage section:</div> <div>- car theft: n.</div> <div>- theft other cases: n.</div> <div>- injuries: n.</div> <div>- Fire: n.</div> <div>- illness: n.</div> <div>- credit/security: n.</div> <div>- Different RCs: n.</div> <div>- Other damage to property: n.</div> <div>- Car/Boat TPL: n.</div> <div>- Transport: n.</div> <div>- Legal protection: n.</div> <div>- Assistance: n.</div> <div>- others: n. 1</div>			
	Distribution channel			
		<div>- counter no. 1</div> <div>- bank website</div> <div>- call center / phone banking;</div> <div>- financial promoter;</div> <div>- credit broker;</div> <div>- not available (even when it is generic on the bank-customer relationship)</div>		

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Condominiums are also considered private customers. **Intermediate customer:** small businesses, artisans, professionals, traders, schools, associations and partnerships; **Others:** types not included in the previous definitions (capital companies, ASL, municipal companies, other companies,...).

Finally, the methods with which the Customer can present a complaint to the Bank are summarized, to be drawn up in written form: direct delivery to the counter, or sending by registered letter with return receipt, fax, e-mail or certified e-mail to the Office address Bank Complaints:

Solution Bank SpA
ca Complaints Office
Corso della Repubblica, 126 – 47121 – Forlì (FC)
Tel. 0543 – 811.137 / Fax 0543 – 811.118
Email: complaints@solution.bank
PEC: legale@pec.solution.bank

The Complaints Office will respond to the Customer within the maximum period of: *i)* 15 working days for complaints concerning payment services (if, in exceptional situations resulting from causes of force majeure or in any case outside the control of the Bank, including strikes, malfunctioning of the information system, etc... or particularly complex cases that imply the need for technical insights or that involve third party suppliers or other payment service providers, etc..., the Bank could not respond within 15 working days, sends the customer an initial response, in which it clearly indicates the reasons for the delay and specifies the deadline within which the customer will receive the final response, in any case not exceeding 35 working days), *ii)* 60 calendar days for complaints relating to banking and financial products and services, *iii)* 45 calendar days for complaints relating to insurance/supplementary pension products and services and *iv)* 60 calendar days for complaints relating to investment services.

The deadline starts from the date of receipt of the complaint by the Complaints Office.

If the Customer is not satisfied or has not received a response within the terms indicated above, he can contact:

- A. in the event of disputes relating to banking and financial operations and services, to the Financial Banking Arbitrator (ABF): if the contested fact is prior to the sixth year preceding the date of filing the appeal, within the limit of 200,000 euros if the complaint involves the request for a sum of money. To find out how to contact the Financial Banking Arbitrator, you can consult the website www.arredabancariofinanziario.it, ask at the branches of the Bank of Italy, or ask at the branches of Solution Bank SpA
- B. in the event of disputes relating to investment services and activities: to the Arbitrator for Financial Disputes (ACF) established at Consob: within one year from the presentation of the complaint to the Bank, within the limits of 500,000 euros if the complaint involves the request for a sum of money and for issues relating to the violation of the obligations of information, diligence, correctness and transparency by the intermediary; the right to appeal to the Arbitrator cannot be waived by the investor and can always be exercised, even in the presence of clauses for the devolution of disputes to other out-of-court resolution bodies contained in the contracts. For further information on the Arbitrator for Financial Disputes (ACF) you can consult the website www.acf.consob.it.
- C. even in the absence of a prior complaint: to the banking conciliation body "Conciliatore BancarioFinanziario" of which the Bank has joined. To find out how to contact the BancarioFinanziario Conciliator, you can request information at the Bank's branches or on the website www.conciliatorebancario.it

If he intends to contact the judicial authority, he must first carry out the mediation procedure before the Conciliation Body, under penalty of inadmissibility of the relevant request.

BancarioFinanziario above, or initiate proceedings before the ABF or, for disputes concerning investment services and activities, before the ACF, according to the procedures above. The mediation procedure takes place before the territorially competent body where the first application was submitted and with the assistance of a lawyer.

The list of mediation bodies accredited by the Ministry of Justice and registered in the Register of mediation bodies pursuant to art. 16 of Legislative Decree 28/2010 is available on the website www.giustizia.it.

In any case, the customer remains unaffected, based on the operating methods of the respective authorities competent in the matter, the right to: *i)* submit complaints to the Bank of Italy according to the procedures established and available on the website www.bancaditalia.it; *ii)* submit complaints to IVASS according to the procedures established and available on the website www.ivass.it; *iii)* submit reports to COVIP according to the established methods and which can be consulted on the website www.covip.it.

All documentation is available on the Bank's institutional website www.solution.bank and at the Branches.

Solution Bank SpA
Complaints office