

UAB „PROFITUS CROWDFUNDING“

**UAB „PROFITUS CROWDFUNDING“ COMPLAINT HANDLING AND DISPUTE RESOLUTION
RULES**

Prepared by:

Approved by the Director

Date 2026-06-11

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Revision History:

Form	Date	Amendment	Page
01	2026-06-11	Approved a new version of the Complaint Handling and Dispute Resolution Procedure	
Remarks:			

1. GENERAL PROVISIONS

1.1. These Complaint Handling and Dispute Resolution Rules of UAB “Profitus Crowdfunding” (hereinafter referred to as the Company or the Platform) (hereinafter referred to as the Rules) establish the procedure for the receipt, registration, examination and assessment of Complaints submitted to the Platform, the adoption of decisions, the provision of Responses to Applicants, and the control of the Complaint management process, in order to ensure:

1.1.1. the prompt, fair and objective examination of Complaints;

1.1.2. the proper retention of information and documents related to Complaint handling;

1.1.3. continuous assessment of Complaint handling outcomes and identification and elimination of the causes giving rise to Complaints;

1.1.4. effective periodic assessment of these Rules and, where necessary, their review.

1.2. These Rules have been prepared in accordance with:

1.2.1. Regulation (EU) 2020/1503 of the European Parliament and of the Council of 7 October 2020 on European crowdfunding service providers for business, amending Regulation (EU) 2017/1129 and Directive (EU) 2019/1937 (hereinafter referred to as the Regulation);

1.2.2. the Rules for the Handling of Complaints Received by Financial Market Participants approved by Resolution No. 03-105 of the Board of the Bank of Lithuania of 6 June 2013 (as amended by Resolution No. 2025/03-169 of the Board of the Bank of Lithuania of 16 December 2025) (hereinafter referred to as the Resolution);

1.2.3. other applicable legal acts.

1.3. These Rules shall apply to all Complaints related to crowdfunding services provided by the Company pursuant to the Regulation.

1.4. These Rules shall not apply to disputes between investors, project owners or other persons, except where the Complaint concerns the actions, omissions or services of the Company.

1.5. The Company is not an arbitration, mediation or dispute resolution body and does not adjudicate civil disputes between parties to crowdfunding transactions, except to the extent necessary for the examination of a Complaint concerning the Company's activities.

2. DEFINITIONS

2.1. The terms used in these Rules shall have the meanings set out below, unless expressly stated otherwise in the context.

Administrator	means a person responsible for the administration of Complaints within the Platform, including the receipt and registration of Complaints in the Register, forwarding Complaints to the Complaint Reviewer, maintaining the Register, ensuring the timely provision of Responses to Applicants, providing information on the Complaint handling procedure, familiarising Company employees with this Procedure, and performing other functions assigned to the Administrator under this Procedure.
Response	means a reasoned decision, explanation or conclusion provided in writing to the Applicant regarding a Complaint that has been examined.
Applicant	means a natural or legal person who has submitted a Complaint.
Complaint	means a written submission addressed to the Company in which the Applicant states that, in the Applicant's opinion, his/her/its rights or legitimate interests relating to the Company's crowdfunding service activities have been infringed and requests that the circumstances described be examined and a Response be provided.
Complaint Reviewer	means a person responsible for the examination of Complaints, including collecting information necessary for the examination of received Complaints, conducting the examination, adopting decisions and preparing Responses to Applicants.
Register	means the electronic register of Complaints submitted to the Company, in which Complaints received by the Company and other information required under this Procedure are recorded.
Other Terms	other terms used in this Procedure shall be interpreted in accordance with the Platform Terms of Use, the Regulation, the Resolution and other applicable legal acts, unless expressly stated otherwise. Unless the context requires otherwise, words used in the singular shall include the plural and vice versa.

3. COMPLAINT SUBMISSION AND ACCEPTANCE

- 3.1. A Complaint must be submitted in writing and must contain at least the following information:
 - 3.1.1. the Applicant's full name or, in the case of a legal entity, the company name;
 - 3.1.2. contact details (e-mail address and/or telephone number);
 - 3.1.3. identification details of the project, investment, agreement or service to which the Complaint relates;
 - 3.1.4. a detailed description of the factual circumstances;
 - 3.1.5. the Applicant's claim or request;
 - 3.1.6. information regarding any damage or losses suffered (if applicable);
 - 3.1.7. any other documents and information supporting the Complaint.
- 3.2. The Applicant shall attach to the Complaint all documents supporting the Applicant's arguments and claims. Where the Applicant submits the Complaint through a representative, a valid power of attorney or another document confirming the representative's authority must be attached to the Complaint, granting the representative the right to submit the Complaint and receive a Response from the Platform on behalf of the Applicant.
- 3.3. The Applicant may include in the Complaint any additional contact details or other information that the Applicant considers relevant for the examination of the Complaint.
- 3.4. A Complaint may be submitted to the Company in electronic or paper form by any of the following means:
 - 3.4.1. by delivering it in person to the Company's registered office at Lviso g. 101, Vilnius;
 - 3.4.2. by sending it by post, courier or other delivery service to the Company's registered office at Lviso g. 101, Vilnius;
 - 3.4.3. by sending it to the Platform's designated e-mail address: info@profitus.lt;
 - 3.4.4. through the Platform's website.
 - 3.4.5. Complaints may be submitted using the Complaint Form approved by the Company and published on the Company's website. If a Complaint is submitted in free form, the Company shall have the right to request that the Applicant supplement the Complaint by providing any missing information.
- 3.5. Where the Applicant submits a Complaint in person at the Platform's registered office, the Platform employee receiving the Complaint shall:
 - 3.5.1. accept the Complaint and perform the actions specified in Clause 4.1 of this Procedure;
 - 3.5.2. provide the Applicant with information regarding this Procedure and, upon the Applicant's request, provide a copy of the Procedure or send an electronic copy of the Procedure to the e-mail address specified by the Applicant;
 - 3.5.3. inform the Applicant that the Complaint handling procedure is free of charge;
 - 3.5.4. forward the Complaint to the Administrator in accordance with the procedure and deadlines established in Clause 4.10 of this Procedure.
- 3.6. Where the Applicant submits a Complaint in person at the Platform's registered office and the Complaint clearly fails to comply with the content and form requirements established by this Procedure, the person receiving the Complaint shall draw the Applicant's attention to such deficiencies and propose that they be corrected.
- 3.7. A Complaint shall be submitted in Lithuanian, English, or in the language in which the services were advertised or in which the Key Investment Information Sheet was provided, and shall comply with the content and form requirements established by this Procedure.
- 3.8. Anonymous Complaints may remain unexamined. However, the Company shall have the right, at its sole discretion, to assess the information provided in an anonymous Complaint and take appropriate action where the circumstances described may be relevant to the legality of the Company's activities, the protection of client interests, or risk management. Where the anonymity of the Complaint prevents the identification of the Applicant or the provision of a Response, the Complaint handling procedure may not be initiated.

4. COMPLAINT REGISTRATION AND REGISTER

- 4.1. Upon receipt of a Complaint submitted by any of the methods specified in Clause 3.4 of this Procedure, the Platform employee receiving the Complaint shall immediately register the Complaint in the Register and record all available information, including:
- 4.2. the Applicant's full name or company name;
- 4.3. the Applicant's contact details;
- 4.4. the date and method of receipt of the Complaint, as well as the position, full name and surname of the employee who received the Complaint;
- 4.5. the subject matter of the Complaint (brief description);
- 4.6. the services or products of the Company that are the subject of the Complaint, including their type;
- 4.7. the date on which the Response is provided to the Applicant;
- 4.8. the final outcome of the Complaint examination;
- 4.9. the full name, surname and position of the Company employee who examined the Complaint and provided the Response to the Applicant.
- 4.10. The Company employee receiving the Complaint shall immediately, but no later than the next business day, forward the Complaint together with all accompanying documents to the Administrator. Where it is not possible to provide the original Complaint documents to the Administrator within the prescribed period, electronic copies of such documents shall be transmitted by electronic means without delay, and the originals shall be provided subsequently.
- 4.11. All Complaints received by the Platform shall be registered in the Register and assigned a registration number. Upon receipt of a Complaint, the Administrator shall review the Register data relating to the Complaint and update it where necessary. The Administrator shall also be responsible, where required and upon instruction of the Company's management, for providing information concerning Complaints received by the Platform and other Register data.
- 4.12. Where, at the time of registration of the Complaint, not all information required to be entered in the Register is available, the Register shall be supplemented as soon as such information becomes available.
- 4.13. The Register data and all other information relating to Complaint handling shall be retained in accordance with this Procedure and applicable legal requirements for the prescribed retention periods.

5. COMPLAINT EXAMINATION AND DECISION-MAKING

- 5.1. The Company shall take all reasonable measures to ensure that a Complaint is examined as promptly and comprehensively as possible. In handling Complaints, the Company shall be guided by the principles of respect for human rights, justice, fairness, reasonableness, objectivity, impartiality, efficiency and other principles established under the laws and regulations of the Republic of Lithuania and the European Union applicable to the Company.
- 5.2. The Company shall acknowledge receipt of a Complaint without undue delay. The Administrator shall be responsible for informing the Applicant that the Complaint has been received by the Company.
- 5.3. No later than 10 business days following receipt of the Complaint, the Applicant shall be provided with a notification containing:
 - 5.3.1. confirmation of receipt of the Complaint;
 - 5.3.2. the contact person or department responsible for handling the Complaint;
 - 5.3.3. the preliminary timeframe for examination of the Complaint;
 - 5.3.4. information regarding any additional information or documents required for examination of the Complaint.
- 5.4. Where the information provided is insufficient for examination of the Complaint, the Complaint Reviewer shall have the right to request additional documents or explanations from the Applicant.
- 5.5. The Applicant shall be granted a period of no less than 10 calendar days to provide additional information, unless the specific circumstances require a longer period.

- 5.6. A Complaint shall be deemed inadmissible if:
- 5.6.1. the language of the Complaint does not comply with the language requirements established by this Procedure;
 - 5.6.2. the Complaint is submitted by an unauthorized or improperly authorized person;
 - 5.6.3. the Complaint does not relate to services provided by the Company;
 - 5.6.4. the Complaint does not comply with the prescribed form requirements.
- 5.7. The Complaint shall be examined and a reasoned Response shall be provided to the Applicant no later than 15 business days from the date on which all information necessary for examination of the Complaint has been received.
- 5.8. Where compliance with this deadline is impossible due to the complexity of the Complaint or other objective circumstances, the Applicant shall be informed of the reasons for the delay and the expected date of the Response.
- 5.9. The Response to the Complaint, including any extended deadline, shall be provided no later than 35 business days from the date of receipt of the Complaint.
- 5.10. The Complaint Reviewer may not investigate Complaints concerning the actions or omissions of the Complaint Reviewer himself/herself or of his/her close relatives (where such relatives are employed by the Platform). In such cases, the Complaint Reviewer shall recuse himself/herself from the examination of the specific Complaint and shall notify the Chief Executive Officer in writing or arrange for another competent person to investigate the Complaint, adopt a decision and prepare the Response. A person whose actions or omissions are the subject of the Complaint, a close relative of such person, or a person directly subordinate to such person may not be appointed to investigate the Complaint. Where any of the persons referred to in this Clause considers that other circumstances exist which may result in or create the appearance of a conflict of interest, such person shall immediately disclose such circumstances and withdraw from the examination or investigation of the relevant Complaint.
- 5.11. Where the circumstances referred to in Clause 5.10 become apparent during the examination of a Complaint, immediate measures shall be taken to eliminate the actual or potential conflict of interest and, where necessary, another Complaint Reviewer shall be appointed.
- 5.12. The Complaint Reviewer shall ensure that all documents, data and other relevant information related to the Complaint are collected and assessed in order to evaluate the compliance of the Company's actions, omissions, decisions or services with applicable legal requirements and internal procedures.
- 5.13. Where the Applicant fails to provide the requested additional information or documents within the prescribed timeframe, the Complaint shall be examined on the basis of the information available to the Company, unless an objective examination of the Complaint is impossible without the requested information.
- 5.14. Taking into account the circumstances established during the examination of the Complaint, the Complaint Reviewer shall prepare a Response and, where applicable, adopt one of the following decisions:
- 5.14.1. to reject the Complaint;
 - 5.14.2. to uphold the Complaint in part;
 - 5.14.3. to uphold the Complaint in full.
- 5.15. Where, during the examination of a Complaint, it becomes apparent that a dispute exists between an investor, a project owner or other persons involved in a crowdfunding project, the Company may,

without breaching confidentiality obligations, provide the parties with information relating to processes and documents administered by the Company.

- 5.16. The Company does not resolve civil disputes between parties, does not perform arbitration or mediation functions, and does not issue binding determinations regarding the mutual rights and obligations of the parties.
- 5.17. Disputes between parties to a crowdfunding transaction shall be resolved in accordance with the laws of the Republic of Lithuania.
- 5.18. Where, during the examination of a Complaint, the Applicant withdraws the Complaint in writing, the Complaint Reviewer shall terminate the examination of the Complaint. In such case, an appropriate entry regarding the withdrawal and termination of the Complaint examination shall be recorded in the Register.
- 5.19. Upon the Applicant's request, the Complaint Reviewer shall appropriately inform the Applicant about any additional actions taken during the examination process and shall respond without undue delay to reasonable requests for information submitted by the Applicant.
- 5.20. Responses shall be provided to Applicants by electronic means or, at the Applicant's request, in paper form.
- 5.21. A Complaint shall be deemed fully examined when a decision has been adopted regarding the issues raised therein and a written Response has been provided to the Applicant.
- 5.22. Complaints, documents relating to their examination, Responses, Register data and other information related to Complaint handling shall be retained in accordance with applicable legal requirements and retention periods, but for no less than three (3) years from the date on which the final Response is provided to the Applicant.
- 5.23. Where a Complaint is rejected or only partially upheld, the Applicant shall be provided with the reasons for rejecting the Complaint or refusing the claim, including justification based on established facts and applicable legal provisions and/or contractual provisions, as well as information regarding other available remedies for the protection of the Applicant's interests, including, without limitation, available dispute resolution mechanisms and competent courts.

6. COMPLAINT MANAGEMENT PROCESS CONTROL

- 6.1. Control of the Complaint management process within the Company shall be carried out by an authorized person appointed by the Chief Executive Officer, who shall also perform the functions of the Administrator. The authorized person appointed by the Chief Executive Officer shall monitor and ensure the effectiveness of the Company's Complaint management process and, where necessary, submit proposals to the Chief Executive Officer regarding improvements thereto.
- 6.2. The Chief Executive Officer shall be responsible for the periodic review of the Company's Complaint Handling Procedure, its effectiveness, and the elimination of identified deficiencies.
- 6.3. For the purposes of Complaint management process control, the authorized person appointed by the Chief Executive Officer shall carry out continuous assessment of Complaint handling outcomes by:
 - 6.3.1. collecting information on similar Complaints relating to the Company's activities as a crowdfunding platform operator, analysing such information in order to identify the root causes of Complaints, and submitting proposals to the Chief Executive Officer regarding priorities for eliminating such causes;

- 6.3.2. assessing whether the root causes of certain Complaints may also result in Complaints concerning other services or products provided by the Company in connection with its activities as a crowdfunding platform operator;
- 6.3.3. assessing whether the root causes of Complaints can be eliminated and submitting proposals to the Chief Executive Officer regarding appropriate corrective measures;
- 6.3.4. where necessary, taking actions aimed at eliminating identified root causes of Complaints;
- 6.3.5. ensuring that information regarding recurring or systemic causes of Complaints is regularly submitted to the Chief Executive Officer to enable the effective performance of management functions.
- 6.4. Analysis of Complaint handling outcomes shall be carried out at least once per year and more frequently where necessary, taking into account the nature, volume and risks associated with Complaints received.
- 6.5. A summary report concerning Complaints received, the outcomes of Complaint examinations, recurring causes and corrective measures implemented shall be submitted to the Chief Executive Officer at least once per year.
- 6.6. Having assessed the information and proposals submitted by the authorized person, the Chief Executive Officer shall make decisions regarding improvements to the Complaint management process, elimination of identified deficiencies, priorities and methods for addressing the causes of Complaints, and management of related Company risks.
- 6.7. Information regarding decisions adopted by the Chief Executive Officer concerning the elimination of operational deficiencies identified through Complaints and related risk management measures shall be retained for no less than three (3) years in accordance with applicable legal requirements.
- 6.8. The Company's authorized person shall provide information to the supervisory authority regarding Complaints received and the assessment of Complaint handling outcomes in accordance with the procedure established by the Resolution.

7. COMPLAINT HANDLING BY OTHER COMPETENT AUTHORITIES

- 7.1. Where the Applicant is dissatisfied with the Company's Response to a Complaint, where the Complaint is upheld only in part, or where the Applicant has not received a Response within the time limits established by this Procedure, the Applicant shall have the right to defend his/her rights in accordance with the laws of the Republic of Lithuania.
- 7.2. An Applicant who qualifies as a consumer under the laws of the Republic of Lithuania shall have the right to apply to the Bank of Lithuania for out-of-court settlement of a consumer dispute in accordance with the Law on the Bank of Lithuania and other applicable legal acts.
- 7.3. Information regarding the procedure for resolving disputes between consumers and financial market participants, including the conditions and process for submitting applications, is published on the website of the Bank of Lithuania at www.lb.lt.
- 7.4. Referral of a dispute to the Bank of Lithuania shall not deprive the Applicant of the right to apply to a competent court in accordance with the laws of the Republic of Lithuania.
- 7.5. Where a Complaint does not fall within the competence of the Bank of Lithuania or relates to activities supervised by another authority, the Company shall, where possible, provide the Applicant with information in its Response regarding the institution to which the Applicant may apply for further protection of his/her rights.
- 7.6. The Company's Response to a Complaint and any information collected during the Complaint examination process shall not be considered an arbitral award, mediation settlement agreement or any

other binding dispute resolution instrument and shall not restrict the Applicant's right to make use of any other remedies available under applicable law.

8. FINAL PROVISIONS

- 8.1. This Procedure may be amended and/or supplemented only by decision of the Chief Executive Officer. Any amendments and/or supplements to this Procedure shall enter into force on the day following their adoption. The Chief Executive Officer shall ensure that Company employees are informed of any amendments and/or supplements in a timely manner.
 - 8.2. The Chief Executive Officer shall be responsible for the proper implementation and supervision of this Procedure. The Chief Executive Officer shall determine who performs the functions of the Administrator and the Complaint Reviewer. The same person may be appointed to perform both the Administrator's and Complaint Reviewer's functions. However, the same person may not simultaneously perform the functions of the Administrator, the Complaint Reviewer, and the person responsible for Complaint management process control.
 - 8.3. The Complaint Reviewer must possess sufficient skills, knowledge and experience to properly fulfil the requirements established by this Procedure.
 - 8.4. The Complaint Reviewer shall be granted access to all information necessary for the examination of Complaints.
 - 8.5. The Administrator shall ensure that all Company employees are familiarised with this Procedure and documents prepared on its basis against signature.
 - 8.6. This Procedure shall be made available to the Company's clients upon request. Information regarding the Complaint handling process shall include at least: (i) the data and information required to be included in a Complaint; (ii) the contact details through which a Complaint must be submitted; (iii) the Complaint examination deadlines; (iv) information regarding the Applicant's right to apply to the Bank of Lithuania for out-of-court settlement of a consumer dispute (where applicable) and/or to a competent court in accordance with the laws of the Republic of Lithuania.
 - 8.7. Appendix to this Procedure: Sample Complaint Form.
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Appendix No. 1 to the Complaint Handling and Dispute
Resolution Procedure of UAB “Profitus Crowdfunding”

COMPLAINT FORM

1.a. Applicant Details:

Surname / Legal Entity Name	Name	Personal Identification Number / Company Registration Number / LEI Code (if applicable)	
Address: Street Name, Building No., Apartment No.	Postal Code	City	Country

Telephone Number		E-mail Address	
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1.b. Contact Details (if different from Section 1.a):

Surname / Legal Entity Name	Name

Address: Street Name, Building No., Apartment No. (for legal entities: registered address)	Postal Code	City	Country

Telephone Number		E-mail Address	
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2. a. Representative's Details (if applicable) (a copy of the power of attorney or other document confirming the right of representation must be attached)

Surname	First Name / Legal Entity Name	Registration Number and LEI Code (if applicable)

Address: Street Name, Building No., Apartment No. (for legal entities: registered address)	Postal Code	City	Country

Telephone Number	E-mail Address

2.b. Contact Details (if different from Section 2.a):

Surname	First Name / Legal Entity Name	Registration Number and LEI Code (if applicable)

Address: Street Name, Building No., Apartment No. (for legal entities: registered address)	Postal Code	City	Country

Telephone Number	E-mail Address

3. Information About the Complaint

3.a. Investment Number (if applicable), Project Name, Project Owner (if known), Investment Date, and Other Information Relevant to the Complaint:

3.b. Please attach any documents supporting your Complaint (e.g., correspondence, payment statements, agreements, screenshots, or any other evidence available to you).

Please provide documents supporting the facts described above:

3.c. Date(s) and/or Period of the Events Giving Rise to the Complaint:

3.d. Description of the Damage, Loss or Harm Suffered (if applicable):

3.e. Other Comments or Relevant Information (if applicable):

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4.a. Applicant's Exact Address and Preferred Method of Receiving the Response (an e-mail address may be provided):

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4.b. Please clearly indicate the outcome you expect (e.g., provision of an explanation, correction of an error, review of a decision, compensation for losses, or any other remedy sought):

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4.c. List of Documents Submitted Together with the Complaint:

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(place)

(Date)

/signature/

I confirm that the information provided in this Complaint is true, accurate and complete to the best of my knowledge.