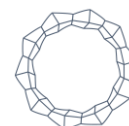


<p>Issuer</p> <p>Compliance Office</p>	<p>PROCEDURE</p> <p>FOR THE RESOLUTION OF PETITIONS</p> <p>Nr. 09/8161/04.08.2023</p>	
<p>Revised I*</p>		<p>Code: BCO-PO-02</p>
	<p>Approved by,</p> <p>Board of Directors</p>	<p>Approved in the meeting of the Board of Directors on 15.08.2023 by decision no. 23, art. 5</p>
	<p>Endorsed,</p> <p>President - General Manager Sorin – Iulian Cioacă</p> <p>Vicepresident - Deputy General Manager Mihai Trifu</p>	

\* Approved in the meeting of the Board of Directors on 09.12.2022 by decision no. 28



## I. PURPOSE

The procedure establishes the manner of carrying out the activity of monitoring, verification and application of the legal provisions relevant to the activity carried out within Infinity Capital Investments S.A. in order to promptly administer the petitions received from investors.

This procedure includes information on the settlement of disputes by mutual agreement and is available to the company's relevant staff, by using suitable internal channels.

## II. SCOPE OF APPLICATION

The procedure for the resolution of petitions is enforced by the functional structures involved in drawing up answers to the petitions received by the company.

## III. REFERENCE DOCUMENTS

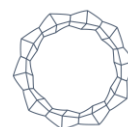
1) *Regulation no. 9/2015* on the settlement procedure for entities regulated entities and supervised by the Financial Supervisory Authority based on Law no. 297/2004 regarding the capital market and Law no. 74/2015 on alternative investment fund managers, for petitions related to their activity on the capital market, as subsequently amended and supplemented;

2) *Regulation no. 4/2016* on the organization and operation of the Entity for the Alternative Resolution of Disputes in the financial non-bank area (SAL-FIN), as subsequently amended and supplemented.

## IV. DEFINITIONS

- ***petition*** - the request, complaint or notification by which the facts are brought to the attention of the company that are likely to affect the rights or interests of the petitioner, made in writing and filed at the company's headquarters or at its secondary offices, as the case may be, sent by post or e-mail, through which a petitioner or proxies acting solely on behalf of the petitioner and without his own commercial interest, expresses dissatisfaction with the service and investment activity provided by the company, the provision of the management service of the AIF's collective investment portfolio or the information provided by the company following requests for information received from petitioners.

- ***petitioner*** - the natural or legal entity, client / investor of the company, who submits a petition to the company regarding the investment service and activity



provided on the basis of the legal provisions in force or the provision of the service of administration of the collective investment portfolio of the AIF in securities;

- ***petition resolved favourably*** - a petition against which measures have been taken to remedy the reported situations.;

- ***petition resolved unfavourably*** – a petition in connection with which no measures have been ordered;

## V. DESCRIPTION OF THE PROCEDURE

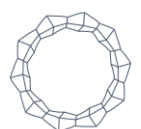
With a view to the resolution of the petitions it receives, properly and by the due deadline, Infinity Capital Investments S.A. has the following obligations:

- keeping records of each petition, as well as the measures taken to solve them.
- providing the petitioner, upon request or when receiving a petition, written information on the internal petition resolution process, within 5 business days from the date when the document is registered;

- providing the audience, at its headquarters and on the company's website, on a permanent basis, with the petition resolution procedure, the contact details needed to request information on the petition resolution status, as well as the methods for the alternative resolution of disputes, as per the legal provisions in force;

- holding and maintaining, at the company's premises a single petition register, in a secure electronic format, per calendar year, restarting the numbering from 01 as every new year begins, in which s/he shall record chronologically, in the order of receipt, all petitions, irrespective of how they are received: by registry, electronic mail; the electronic single petition register will be secured by implementing a mechanism guaranteeing the maintenance of documents and must include at least the following information:

- number of the petition;
- date of the petition;
- the petitioner's identity, including the address, telephone number, e-mail and the service/activity to which it relates;
- the name, surname and position of persons within company against which the petition was formulated or to whom the petitioner addressed for the provision of the relevant service/activity;
- the object of the petition;
- the status of the petition;
- the date and manner of settlement of the petition;
- the reason why the petition was not resolved favourably (if applicable);
- the damage claimed by the petitioner (if applicable);
- comments;



- answering each petition received from the petitioners in simple and easy-to-understand language within a maximum of 30 days from the date of its registration, regardless of whether the solution is favourable or unfavourable.

The company's management and the compliance officer are directly liable for:

- the proper organization and conduct of the work of reception, registration and settlement of petitions;
- the legality of the adopted solutions;
- notifying the adopted solutions to the petitioners and to the F.S.A., upon the latter's request, by the due deadline.

The compliance officer is liable for:

- supervising the resolution and management of the received petitions;
- sending the F.S.A., with an electronic signature and time stamp, the Single Petition Register, within the prescribed deadlines and according to the legally envisaged forms.

All entries made in the Single Register of Petitions in a calendar year and their global total will be kept by the compliance officer for a period of 5 years from the time of submission of the initial petition.

Information on the procedure for resolving petitions is available on the company's own website [www.infinitycapital.ro](http://www.infinitycapital.ro).

## A. CARRYING OUT THE PROCESS OF RECEIVING PETITIONS:

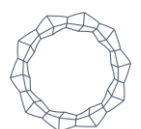
### 1. Receipt and registration of the petition

Any received petition will be registered in the *General Register of Incoming/Outgoing Documents* within Infinity Capital Investments S.A., with the number/date/hour and identification data of the petitioner, irrespective of how the petition was sent.

The personal data within the petitions will be processed as per Regulation no. 679/2016 on the protection of natural persons regarding personal data processing and the free movement of such data, only for the purpose for which they were provided.

After this step, the petition will be registered in the *Single Petition Register*.

### 2. Checking and drawing up the Petition Analysis Report



The analysis of the facts recorded in the petition and documentation to establish their veracity in collaboration with all the functional departments that can provide the information necessary to resolve the petition.

The petition analysis report and the answer shall be sent to the upper management for analysis and endorsement. Depending on the complexity of the situation, the General Manager may decide to have the material analysed by the Audit Committee and/or the Board of Directors.

In case the issues notified in the petition require a more detailed investigation, the Upper Management may decide to extend the term of settlement by a maximum of 15 days, a situation that will be communicated to the petitioner;

### 3. *Sending the answer to the petitioner*

It is done by certified mail, with confirmation or receipt, or by e-mail, by the due deadline, irrespective of whether the solution is favourable or not. The answer will include simple, clear and easily understandable information, or, as the case may be, the status of the settlement of the petition or the alternative arrangements.

The petitioners may send petitions and request information on the status of their resolution to [petitii@infinitycapital.ro](mailto:petitii@infinitycapital.ro).

When a final solution is adopted that does not meet/contradicts the petitioner's request(s), the company must support its viewpoint in writing, providing detailed explanations on the adopted measures, and inform the petitioner that s/he has the right to notify the relevant bodies and authorities and use the means of settling disputes by mutual agreement, as provided by the legal provisions in force.

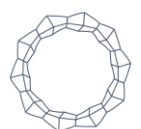
When a petition is received and registered, the company will send to the F.S.A., upon the latter's request, within 5 days from the receipt of the request or as explicitly stipulated therein, all the information and documents available in order to settle this petition.

The company's shareholders are not restricted in exercising their rights, including the right to petition.

The following requests do not qualify as *petitions*:

- those regarding other activities than the ones undertaken by the company as per its Articles of Incorporation;
- those notifying deeds/actions of persons outside the company;
- those regarding the activities of another entity, towards which the company has no legal or regulatory liability.

Telephone complaints that are not followed by the submission / transmission of a petition in writing or electronically, by means of e-mail, will not be considered petitions and as a result will not be registered in the Single Register of Petitions and



will be filed, stating the reason for filing. The same treatment will be applied to anonymous petitions or those in which the identification data of the petitioner are not entered.

If a petitioner sends the company several petitions on the same issues, they will be connected and the petitioner will receive a single answer, which must refer to all the received petitions.

If, after the reply has been sent, a new petition is received from the same petitioner, with the same content, it shall be filed, with the initial number mentioning that it has been replied to. For this, the Report on the filing of the petition according to Annex no. 1 to this procedure.

With a view to protecting the investors' rights, the Financial Supervisory Authority checks the enforcement and compliance of legal provisions and can check how the company has settled the petitions. To this purpose, Infinity Capital Investments S.A. sends to the Financial Supervisory Authority, on a quarterly basis, an electronic copy of the Single Petition Register.

In order to ensure the transparency of the registration and settlement of petitions, the Compliance Officer will send to ASF quarterly and annually, until the end of the month following the end of the quarter, respectively the year, the reports contained in Annexes 1 and 2 of ASF Regulation no. 9/2015 with subsequent amendments.

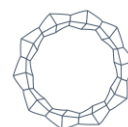
## **B. ALTERNATIVE DISPUTE RESOLUTION**

According to the legal provisions, other alternative dispute resolution methods that the interested parties may resort to are: *Arbitration, Mediation, SAL-FIN.*

SAL-FIN for the financial non-bank market is established by the Financial Supervisory Authority as an alternative dispute resolution entity between a trader operating in Romania and subject to authorisation, regulation and/or supervision by the F.S.A., as the case may be, and a consumer residing in the European Union.

SAL-FIN is the only alternative dispute resolution entity in the fields where F.S.A. is competent, organising and managing SAL procedures by which a solution is proposed or imposed to the parties, as the case may be.

In order to solve a dispute with a professional/trader by enforcing the SAL-FIN procedure, the petitioner must voluntarily express this option and inform SAL-FIN in writing, directly at its premises, by mail or by electronic means of communication. Any petitioner is entitled to refer to SAL-FIN, as per the provisions of FSA Regulation no. 4/2016 on the organization and operation of the Alternative Dispute Resolution



Entity in the financial non-bank field and GO 38/2015 on alternative dispute resolution between consumers and traders.

Infinity Capital Investments S.A., as an entity authorized, regulated and supervised by the F.S.A., will inform the petitioner, also by publishing on its own website, on their right to use alternative dispute resolution as per the legislation in force, as well as on the conditions to access dispute resolution procedures.

## VI. RESPONSIBILITIES

- receipt/registration of entry: Public Relations Office/General Registration Office;
- registration in the Single Petition Register: Compliance Office;
- drawing up the answer: functional structures holding information/documents regarding the notified issues, in cooperation with the Compliance Office;
- endorsing the answer: the upper management and the Audit Committee/Board of Directors, if applicable;
- sending the answer: Compliance Office;
- filing report: Compliance Office, if applicable.

## VII. REVISION OF THE PROCEDURE

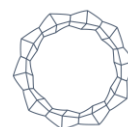
The procedure will be revised annually and whenever changes occur in the legal framework regarding this activity, it will be approved by the Board of Directors and will be published to inform investors on the company's website: [www.infinitycapital.ro](http://www.infinitycapital.ro).

Compliance Officer,  
Balan Viorica

Endorsed:

Compliance Office  
Bălan Viorica

Legal Department  
Mirela Dănescu



Annex no. 1

**Petition filing report**

<p><b>Infinity Capital Investments S.A.</b></p>	<p>Unclassified No..... Of..... Copy no.:.....</p>
	<p>Approval General Manager,  Deputy General Manager,</p>

Please find attached the petition of ..... from (mailing address) .....  
....., registered with no. .... from....., requesting:

.....  
.....

Infinity Capital Investments S.A. drew up and sent a response to the Petition received from ..... by Notice no. ... / .....

In accordance with the provisions of the Internal Petition Resolution Procedure, approved by the Board of Directors and applicable on this date, please approve the filing of the paper.

Compliance Officer

