

COMPLAINTS, APPEALS AND SETTLEMENT BANCO BPM SPA

Complaints

For the Banco BPM Group, complaints are of fundamental importance as they allow us to retain a high level of attention on customer requirements at all stages of the relationship and in particular in the event of discontent and potential conflict.

The branches of the Banco BPM Group and the Client Service are the first port of call for solving the problems of customers. If, however, a customer feels that they have not received adequate answers and/or a dispute is particularly complex, they may make a specific complaint by one of the methods listed below:

1. Online by filling out the appropriate [web form \(log in here\)](#) or by email at the following email address: reclam@bancobpm.it.

2. By letter by hand delivery (with issue of a "receipt") at one of the branches of the Banco BPM Group, by ordinary mail or preferably by registered letter with acknowledgement of receipt to:

Banco BPM S.p.A.
Complaint Handling
Via Polenghi Lombardo 13
26900 Lodi, Italy

3. By certified email (PEC) at the following email address reclami@pec.bancobpm.it

Once the Bank has registered the file in its computer systems, it will send the customer a communication acknowledging receipt of the dispute and stating the maximum response time.

The Bank is required to reply within the following time limits:

- within 60 calendar days of receipt if the complaint relates to banking and financial products and services or investment;

However, the Bank is committed to providing a response as quickly as possible.

Alternative Dispute Resolution

DISPUTES RELATING TO BANKING AND FINANCIAL TRANSACTIONS AND SERVICES

- **Appeal to the Banking and Financial Ombudsman (ABF):**
 - if the contested transaction or behaviour is after 01/01/2009. Starting from 1 October 2022, disputes relating to operations or conduct prior to the sixth year to the filing of the appeal, cannot be submitted to the ABF.
 - within the limit of €200,000 if the request is for the payment of a sum of money

- if a complaint has been submitted and no more than 12 months have elapsed since it was submitted
- if there are no other pending out-of-court dispute resolution procedures, including at Bank's initiative to which the customer is a party, or proceedings before the Judicial Authorities.

However, an appeal to the ABF is possible if a conciliation or mediation procedure is unsuccessful or if it has been initiated by the broker and the customer has not joined it.

An appeal to the ABF may only be filed by the customer, either personally or through an association representing the interests of consumers, or through an attorney.

The decisions of the ABF are not binding on the parties, who always have the option of appealing to the ordinary Judicial Authorities. However, if the broker does not comply with the decision taken, this failure will be published on the ABF website and on the home page of the broker's website. To find out how to apply to the Arbitrator, you can consult the website www.arbitrobancariofinanziario.it, ask for information at any branch of the Bank of Italy, or at one of the branches of the Banco BPM Group.

- **Activate a Mediation/Conciliation procedure at the Financial and Banking Conciliator (Associazione per la soluzione delle controversie bancarie e societarie _ADR):**

This procedure can be activated even in the absence of a prior complaint, in order to reach an agreement.

This is without prejudice to the possibility of appealing to the ordinary Judicial Authorities in the event that the conciliation is concluded without an agreement. Completing the mediation procedure is a condition for the admissibility of the court proceedings.

The Regulations and forms can be consulted on the website www.conciliatorebancario.it in the "Mediation and Training" section or requested from one of the branches of the Banco BPM Group. This procedure can also be activated at another Body provided that it is entered in the appropriate register kept by the Ministry of Justice and specialised in banking and financial matters.

DISPUTES RELATING TO INVESTMENT SERVICES AND PRODUCTS

- **Appeal to the Financial Dispute Arbitrator (ACF):**
 - if a retail customer
 - if the value of the claim does not exceed €500,000
 - if a complaint has been submitted and no more than 12 months have elapsed since it was submitted
 - if there are no other pending out-of-court dispute resolution procedures, including at Bank's initiative to which the customer is a party, or proceedings before the Judicial Authorities
 - if the dispute concerns a breach of the obligations to provide information, diligence, fairness and transparency required of brokers

An appeal to the ACF may only be filed by the customer, either personally or through an association representing the interests of consumers, or through an attorney.

An appeal to the ACF is excluded if the dispute concerns damages that are not the direct and immediate consequence of the Bank's breach or violation of the aforementioned obligations or non-economic damages.

The decisions of the ACF are not binding on the parties, who can always appeal to the Judicial Authorities. However, if the broker does not comply with the decision taken, this failure will be published on the ACF website and on the broker's website as well as in two national newspapers.

More information can be found at <https://www.acf.consob.it>

- **Activate a Mediation/Conciliation procedure at the Financial and Banking Conciliator (Associazione per la soluzione delle controversie bancarie e societarie _ADR):**

This procedure can be activated even in the absence of a prior complaint, in order to reach an agreement.

This is without prejudice to the possibility of appealing to the ordinary Judicial Authorities in the event that the conciliation is concluded without an agreement.

The Regulations and forms can be consulted on the website www.conciliatorebancario.it in the "Mediation and Training" section or requested from the branches of the Banco BPM Group.

This procedure can also be activated at another Body provided that it is entered in the appropriate register kept by the Ministry of Justice and specialised in banking and financial matters.

More information on the subject can be also obtained by consulting the following websites:

<https://www.consob.it>

<https://www.bancaditalia.it>

<https://www.giustizia.it>