

RULES ON HANDLING COMPLAINTS AND COMMENTS

1. Objectives and scope

- 1.1. These rules are established on the basis of Article 19 of Act no. 161/2002 on Financial Undertakings and Article 26 of Commission Delegated Regulation (EU) 2017/565 as regards organisational requirements and operating conditions for investment firms which legally came into effect in Iceland, cf. Article 3(3) of Act no. 115/2021 on Markets in Financial Instruments.
- 1.2. The purpose of the rules is to ensure transparent work procedures regarding the handling of complaints and comments that ACRO Securities hf. (hereinafter “the Company”) receives from clients and ensuring that the handling of the issues of the complaints is fair and swift. The purpose of the rules is to ensure complaints and comments are responded to and that action is taken to, among other things, prevent the error from reoccurring, if an error has occurred.
- 1.3. These rules apply to all complaints and comments received regarding the Company's securities trading.

2. Procedure for complaints and comments

- 2.1. Complaints and notifications received by the Company's employees shall be sent to the Company's Compliance Officer within 24 hours of receiving the complaint or comment.
- 2.2. The Compliance Officer shall classify the complaints and comments according to whether they constitute alleged violations of the law, regulations or work procedures or are general comments on improving services.
- 2.3. The Compliance Officer supervises responses to complaints regarding alleged violations of the law, rules or work processes, after consulting with the CEO. The directors of the divisions that other general complaints or comments involve shall supervise their responses, and they are authorised to respond to smaller complaints and comments if there are no disputes between the Company and a client. However, the CEO must always be notified.
- 2.4. The Compliance Officer can entrust the handling of complaints to an employee of the Company.
- 2.5. If an employee receives an oral complaint and is unable to resolve it, the client shall be informed of the possibility of writing a letter on the subject of the complaint to the Compliance Officer, if the complaint concerns a violation of the law, regulations or work procedures or to the relevant director if they are complaints or comments of another nature.
- 2.6. All complaints and comments shall be answered as swiftly as possible and the Compliance Officer shall endeavour to resolve all complaints to the best of his/her ability. The Compliance Officer shall ensure that all complaints are answered within a reasonable period of time.

3. Complaints register

- 3.1. The Compliance Officer keeps a record of all complaints and comments received by the

Company.

3.2. The Compliance Officer shall regularly inform the CEO about the complaints and comments that have been received.

4. Examination of cases

4.1. The Compliance Officer or relevant employees examining a case shall have unrestricted access to the data necessary to deal with the complaint.

5. Complaints committee

5.1. If the Compliance Officer considers the client's complaint of an alleged violation of the law or regulations to be unfounded, it shall be pointed out to the client that they can direct the complaint to the Complaints Committee on Transactions with Financial Firms.

6. Implementation

6.1. If the client's complaint regarding a violation of the law, regulations or work procedures is founded, the CEO shall be informed. The Compliance Officer and the CEO must take appropriate measures to prevent mistakes from reoccurring. The employee who is the object of a complaint shall be notified of the Compliance Officer's position.

7. Entry into force

7.1. These rules take effect upon approval by the Board of Directors.

Approved by the Board of Directors of ACRO Securities hf. on 10 August 2021.

Reviewed and approved by the Board of Directors of Acro Securities hf. on 6 July 2023.

Revised and approved by the Board of Directors of Acro Securities hf. on 26 September 2024.