



## COMPLAINTS HANDLING POLICY

### Background and objectives

The handling of complaints is not only a duty for a company that carries out a delicate series of services for the public, but also an important moment of growth and improvement of the organization.

Complaints are a very important indicator of customer satisfaction, i.e. the customer's perception of how well their requirements have been met. We must remember, however, that their absence does not necessarily imply that the Customer is satisfied. The technical literature, in fact, shows that only 3-5% of customers complain in case of dissatisfaction; the others are customers who are practically lost or highly at risk.

The objectives of the complaints management policy are:

- a) improve customer satisfaction through the creation of a customer-oriented environment that is open to feedback information;
- b) resolve complaints received and increase the organization's capabilities to improve its services to the Project Owner and the Investor;
- c) engage the company through adequate acquisition and use of resources;
- d) recognize and pay attention to the needs and expectations of those who complain;
- e) provide Clients with an open, effective and easy-to-use complaints process, as well as free of charge;
- f) analyse and evaluate complaints to improve the quality of the service;
- g) perform an audit of the complaints handling process;



- h) review the effectiveness and efficiency of the complaints process.

With this in mind, Ener2crowd is interested in stimulating the sending of complaints by Customers to:

- a) prevent dropouts and negative word-of-mouth;
- b) know one's own faults and learn how to correct them;
- c) derive information about new expectations;
- d) recover lost or dissatisfied customers.

In handling complaints, Ener2crowd will:

- a) offer a timely and satisfactory response to those who complain;
- b) provide systematicity and consistency in the way complaints are handled;
- c) increase the company's ability to identify trends that determine the development of complaints and eliminate, over time, any recurring causes;
- d) encourage a customer-oriented approach;
- e) set up a better system for continuous review of processes and constant improvement of your service level.

In particular, in the management of complaints, Ener2crowd intends to operate according to the following principles:

- 1) **Visibility:** information on how and where to file a complaint will be well publicised;
- 2) **Accessibility:** the grievance process will be easily accessible to all complainants using the form attached to Delegated Regulation (EU) 2022/2117, below, and supporting



- information will be easy to understand and written in plain language;
- 3) Responsiveness: Complainants will be treated courteously and informed of the progress of their complaint during the complaint handling process;
  - 4) Objectivity: The grievance process will handle each complaint in a fair, objective and unbiased manner;
  - 5) Costs: Access to the complaint processing process will be free of charge for the complainant;
  - 6) Confidentiality: Information that personally identifies the complainant will be protected so that it is not disclosed without the express consent of the customer or complainant;
  - 7) Accountability: Ener2crowd will guarantee the presence of clear responsibilities and delegations with respect to the actions and decisions of the organization itself with regard to the handling of complaints;
  - 8) Continuous improvement: Continuous improvement of the complaint handling process and product quality will be a permanent goal of the organization.

### **Complaints Procedure**

The complaint procedure is prepared in accordance with the provisions of Delegated Regulation (EU) 2022/2117. The complaint process will be published in an easily identifiable section, together with the complaint form, on the Ener2crowd website, and is structured as follows.

- (1) The person in charge of the procedure (hereinafter: the "**Processor**") will



be Dr. Maria Chiara Porro.

- (2) The entire procedure is carried out by e-mail. Complaints should be sent by e-mail to the e-mail address [amministrazione@ener2crowd.com](mailto:amministrazione@ener2crowd.com).
- (3) The complaint can be made by submitting the attached form, filling in the fields indicated therein. The complaint can be submitted in Italian or English.
- (4) Within 10 working days, the Manager shall notify the complainant:
  - a) Your identity and telephone and e-mail contact details, with the clarification that the Data Processor is the person to whom requests regarding the complaint may be addressed;
  - b) The admissibility or inadmissibility of the complaint:
    - (i) in the event of inadmissibility, a clear and comprehensible explanation of the reasons for the inadmissibility will be provided;
    - (ii) In case of eligibility, the communication will also be accompanied by the following information:
      1. the opening of the phase of analysis of the complaint and the investigation, in which it can also put the complainant in contact with the subjects involved in the facts that are the subject of the complaint, in order to seek possible solutions.
      2. the timeframe set out below for the complaint procedure and for the decision on the complaint;
      3. the possibility for the complainant to request to receive communications by paper correspondence, otherwise they



will be by e-mail.

- (5) Within the following 7 working days, the Manager communicates to the complainant the outcome of the complaint and the measure taken, which is stored in the electronic file relating to the complaint, with any consequences of the complaint, the solution, the corrective action.
- (6) The deadline of 7 working days referred to in the previous paragraph is suspended in the case of requests for additions or clarifications on the basis of the provisions of the following paragraph, until such additions or clarifications are completed. In any case, the decision on the complaint must be taken within 30 working days of the communication of admissibility; if the information, documents or additions have not been provided, the complaint is resolved at the state of the proceedings.
- (7) The procedure will be published on the Ener2crowd website in all the languages in which the KIIS is published, in accordance with art. 23 and 24 of Regulation (EU) 2020/1503 or marketing communications pursuant to art. 27 of Regulation (EU) 2020/1503.
- (8) All communications with the complainant will take place in the language used by the complainant when lodging the complaint, provided that it is one of the languages in which the KIIS is published, in accordance with art. 23 and 24 of Regulation (EU) 2020/1503 or marketing communications pursuant to art. 27 of Regulation (EU) 2020/1503

#### **(B) Preliminary activities**



(B.1) Each complaint will be recorded with all supporting documentation and will be assigned an identification code; it will then be classified according to one of the following subject areas:

1. legal and compliance issues;
2. problems related to the Project Owner's project evaluation;
3. technical problems, related to the operation of the portal and the IT structure;
4. problems related to the identification of the Investor, the assessment of adequacy and/or appropriateness, the execution of the investment, or in any case to the activities under the control of the banking partner;
5. Issues that do not fall into the above categories.

(B.2) On the basis of the classification, the Processor identifies any external resources to be involved in the analysis and handling of the complaint.

(B.3) Each complaint shall be reviewed without delay for clarity and completeness. If it is not clear and complete, the Responsible Party shall promptly request from the complainant any additional information necessary for the handling of the complaint (information, documentation or evidence).

(B.4) The Controller shall review all relevant information, documents and evidence.

(B.5) The Processor shall keep the complainant duly informed of any further steps taken to deal with the complaint and shall promptly respond to any reasonable request for information or updates.

(B.6) Complaints and related procedures shall be reviewed at least annually in order to develop company *best practices* and to assess the need and opportunity to devote additional resources to the sector.

### **(C) Decisions**



(C.1) The decision on the complaint shall highlight all the points raised in the complaint and explain the reasons that emerge at the end of the investigation .

(C.2) The decision on the complaint is in line with previous decisions on similar matters, unless there is a reasoned reason to follow a different approach.

(C.3) If, for exceptional reasons, the decision on the complaint cannot be taken within the time frame set out above, the Responsible Party shall inform the complainant of the reasons for the delay , setting a new deadline.

(D.4) If the decision rejects the complaint in whole or in part, it shall contain an explanation of the reasons and inform the complainant of the possible forms of objection and the possibility of lodging an appeal with a Competent Authority, on the basis of Article 38 of Regulation (EU) 2020/1503 or of initiating civil legal proceedings.

### **Register of Complaints**

The register of complaints has been established pursuant to Art. 7 par. 3 of the Regulation.

The Person in Charge will be obliged to record in the register all complaints received and the measures taken.

The register must also indicate the date and time of receipt of the complaint and the person concerned.

The register will be kept in digital format and will be subject to annual review.

[Click here to download the form](#)